

04-11-2016

Marte, Jon and Ward, Melissa

Invoice Number: N/A

Invoice Period: 10-01-2015 - 03-31-2016

Payment Terms: Due Upon Receipt

RE: FLSA: Marte, et., al. v. GDIT

Date	Professional	Description	Hours	Amount
10-07-2015	Robert J. Lowe, Jr.	Identify process server via Alexandria contacts; review website; provide information to Pat Kernan.	0.500	240.00
10-07-2015	Robert J. Lowe, Jr.	Receive filed copy of complaint; prepare short response; forward complaint to SC co-counsel with update and coordination request re: forward action strategy and division of labor as well as inquiry as to timing of the filing of pro hac vice applications.	0.500	240.00
10-12-2015	Robert J. Lowe, Jr.	Prepare memorandum (.5) and attend strategy meeting with Ed Westbrook, Jay Ward, Bobby Wood.	1.500	720.00
10-20-2015	Robert J. Lowe, Jr.	Receive email re: preparation of factual statement for use in motion for certification; prepare response to Pat Kernan.	0.250	120.00
10-22-2015	Robert J. Lowe, Jr.	Receive telephone call from GDIT attorney Russell Bruch: introduction and request extension; prepare email update to team.	0.250	120.00
10-22-2015	Robert J. Lowe, Jr.	Receive and review email from GDIT attorney Bruch with agreed Motion and Order; prepare response.	0.250	120.00
11-09-2015	Robert J. Lowe, Jr.	File maintenance and forward strategy updates; answer due 11/12/15	0.750	360.00
11-16-2015	Robert J. Lowe, Jr.	Prepare initial discovery plan outlining issues in defendant's answer and analysis of proof issues; prepare working memorandum for discussion with cocounsel.	2.000	960.00
11-16-2015	Robert J. Lowe, Jr.	Conference call with Ed Westbrook, Bobby Ward and Katie McElveen: consolidate strategy and coordinate preparation of memoranda of law on Rule 58 options and conditional certification of collection as well as draft Rule 33, 34 and 36 discovery requests.	0.750	360.00
11-16-2015	Robert J. Lowe, Jr.	Interview Miami-based GDIT employee John Charcas on issues relating to overtime, regimen, time keeping plus.	0.750	360.00
11-17-2015	Robert J. Lowe, Jr.	Prepare email update to team members following re: GDIT position re: conditional certification; prepare separate email to Ed Westbrook: need for discovery drafts (entries consolidated and reduced).	0.250	120.00
11-17-2015	Robert J. Lowe, Jr.	Prepare for and phone conference with Ed	0.250	120.00
			Page	e 1 of 5

Date	Professional	Description	Hours	Amount
		Westbrook: update telephone conference issues re: GDIT and collective action strategy.		
11-17-2015	Robert J. Lowe, Jr.	Return telephone call from Pat Kernan: update progress of identifying other persons for collective action: go team and non-go team members; review Painter (relatively small claim; non-go team) and Ricks (hard to contact) issues (time consolidated and reduced).	0.250	120.00
11-17-2015	Robert J. Lowe, Jr.	Update spread sheet of potential plaintiffs with updated information and need to follow up; forward to Pat Kernan with follow up requests.	1.500	720.00
11-17-2015	Robert J. Lowe, Jr.	Telephone call from co-counsel Ed Westbrook: update and coordination: discovery responses, use of Kernan list and forward action strategy: defendant's potential agreement re: conditional certification.	0.500	240.00
11-17-2015	Robert J. Lowe, Jr.	Initial review of 236-page DHS RFP - GD One.	1.500	720.00
12-02-2015	Robert J. Lowe, Jr.	Prepare template for us in discussing discovery relating issues and draft pre-trial joint discovery plan.	1.000	480.00
12-03-2015	Robert J. Lowe, Jr.	Edit discovery plan and joint discovery draft; forward to Ed Westbrook.	0.750	360.00
12-03-2015	Robert J. Lowe, Jr.	Prepare for and extended phone conference with Westbrook: Joint Discovery Plan; update strategy; deal with issues relating to potential Rule 58 issue (time reduced).	1.000	480.00
12-03-2015	Robert J. Lowe, Jr.	Receive and review updated memo on mootness of cases and Rule 68; review strategy.	0.500	240.00
12-04-2015	Robert J. Lowe, Jr.	Receive and review Marte supplemented W-2 and paystub information related to GDIT; prepare acknowledgement email to Jon; prepare email to Kernan requesting follow up with Melissa Ward.	0.500	240.00
12-07-2015	Robert J. Lowe, Jr.	Prepare for and telephone conference with Pat Kernan: forward action re: conditional certification (. 75) (time reduced by .25); conference call with Bobby Wood: re: discovery issues, collective action motion and scheduling (1.25) (time reduced by .25).	2.000	960.00
12-16-2015	Robert J. Lowe, Jr.	Prepare for (.25) and participate in phone conference with co-counsel re: discovery; initial disclosures, collective action motion and note (1.75)(time reduced by .25).	2.000	960.00
12-17-2015	Robert J. Lowe, Jr.	Prepare for and participate in phone conference with co-counsel Kernan and Westbrook team.	1.000	480.00
12-17-2015	Robert J. Lowe, Jr.	Receive and review defendants' sketch Scheduling Order; review Katie's suggestions; telephone call with Ed Westbrook; telephone calls to and from GDIT attorney Bruch: work out details in Scheduling Order regarding when memo in opposition due to our motion for conditional certification.	0.500	240.00
12-17-2015	Robert J. Lowe, Jr.	Initial receive and review GDIT discovery; final review of Marte discovery.	0.500	240.00
12-18-2015	Robert J. Lowe, Jr.	Receive and respond to Katie's inquiry re: service; prepare reply with GDIT discovery; receive response.	0.250	120.00
12-21-2015	Robert J. Lowe, Jr.	Receive email from Puma with deposition request; forward availability to co-counsel Ed Westbrook.	0.500	240.00
12-30-2015	Robert J. Lowe, Jr.	Prepare for (.25) and phone conference with Jay Ward, Bobby Wood and Pat Kernan: GDIT liability for subcontractor overtime under FLSA; review issues re: narrowing class certification issues, our discovery responses and representative plaintiffs' depositions (time reduced by .5).	0.500	240.00
01-07-2016	Robert J. Lowe, Jr.	Outline deposition preparation memo for use with	3.000	1,440.00

Date	Professional	Description	Hours	Amount
		Melissa Ward (2.0); participate in phone conference with Ms. Ward preparing her for deposition (1.0) (time reduced by 2 hours).		
01-08-2016	Robert J. Lowe, Jr.	Adapt memo for use in preparing Marte for deposition (.5); participate in deposition preparation session (1.5) (time reduced by 1 hour).	2.000	960.00
01-11-2016	Robert J. Lowe, Jr.	Initial receive and review documents described in GDIT's Rule 45 subpoena from Jon Marte and Melissa Ward.	2.000	960.00
01-11-2016	Robert J. Lowe, Jr.	Update strategy and the potential need to serve objections to Rule 45 subpoenas as applicable to parties by review of Rule 45 and Rule 30 and noting that unlicensed counsel Bruch signed both notices by comparison of signatures.	0.750	360.00
01-11-2016	Robert J. Lowe, Jr.	Prepare follow on email to Pat Kernan asking clients to confirm that no other documents exist that are described in errant Rule 45 subpoenas; update objection for us in depositions.	0.500	240.00
01-13-2016	Robert J. Lowe, Jr.	Prepare for (.25) and conference call with Ed Westbrook, Jay Ward, Bobby Wood and Pat Kernan: discovery on opt-in plaintiffs; update deposition strategy (time reduced by .5).	0.750	360.00
01-14-2016	Robert J. Lowe, Jr.	Final preparation to defend Jon Marte deposition (1); meet with Jon Marte for final preparations (2); defend deposition and meet with Russell Bruch (7.5); debrief Marte (.5); post briefing with Kernan (.5).	11.500	5,520.00
01-15-2016	Robert J. Lowe, Jr.	Final preparations to defend Melissa Ward deposition (.5); meet with Melissa Ward to prepare her for deposition (2.0); defend Melissa Ward deposition (6.5); debrief Melissa Ward (.75); meet with Russell Bruch (.25); meet with Kernan (.5).	10.500	5,040.00
01-15-2016	Robert J. Lowe, Jr.	Analysis of issues related to privileged information requested by GDIT vis a vis non-opted in plaintiffs (. 25); telephone conference with Jay Ward (.25).	0.500	240.00
01-19-2016	Robert J. Lowe, Jr.	Prepare responses and finalize Rule 33 Requests by reference to exhibits and subpoenaed documents.	2.500	1,200.00
01-19-2016	Robert J. Lowe, Jr.	Exchange 19 emails with attorney Pat Kernan: coordinate provision of signed signature page and references to ITOM documents re: "Help Desk" issues, privilege log, damages, Marte text message plus.	1.500	720.00
01-19-2016	Robert J. Lowe, Jr.	Coordinate bates stamping convention for ITOM contracts, conduct summary review of 367 pages of contracts for use in responding to defendant's Rule 33 and Rule 34 requests.	1.000	480.00
01-19-2016	Robert J. Lowe, Jr.	Prepare responses to and finalize Rule 34 Requests by reference to exhibits and subpoenaed documents.	2.000	960.00
01-19-2016	Robert J. Lowe, Jr.	Prepare and publish privilege log.	0.500	240.00
01-19-2016	Robert J. Lowe, Jr.	Receive subpoenaed documents from attorney Russell Bruch; forward to Jon Marte with email request.	0.250	120.00
01-20-2016	Robert J. Lowe, Jr.	Receive email from Bruch: suggesting alternative disgorgement of information gained during investigation of claim; prepare detailed email to cocounsel Westbrook, Ward and Kernan seeking discussion of issue.	0.750	360.00
01-20-2016	Robert J. Lowe, Jr.	Receive email from Bruch: requesting Bates 401-403 in native format; provide document to Bruch.	0.250	120.00
01-20-2016	Robert J. Lowe, Jr.	Prepare email to Pat Kernan: inquiry about spreadsheet; receive response.	0.250	120.00

Date	Professional	Description	Hours	Amount
01-20-2016	Robert J. Lowe, Jr.	Receive responsive email from Jay Ward on privilege issues; organize and coordinate bates stamping of privileged emails; prepare response to Jay Ward with ABA article on privilege.	0.750	360.00
01-25-2016	Robert J. Lowe, Jr.	Review GDIT brief in opposition to motion for collective action certification (.25); participate in phone conference with Ed Westbrook, Jay Ward, Bobby Wood and Pat Kernan (.75).	1.000	480.00
02-02-2016	Robert J. Lowe, Jr.	Prepare for (.25) and participate in phone conference with Jay Ward, Bobby Wood and Pat Kernan: strategy for hearing before Judge Ellis (.75).	1.000	480.00
02-04-2016	Robert J. Lowe, Jr.	Prepare for hearing before Judge Ellis; outline issues of potential inquiry; prepare memorandum of law (time reduced by 2 hours).	4.000	1,920.00
02-05-2016	Robert J. Lowe, Jr.	Final preparations for hearing before Judge Ellis; update strategy.	2.000	960.00
02-05-2016	Robert J. Lowe, Jr.	Appear before Judge Ellis including pre and post discussions with GDIT counsel at court house.	3.000	1,440.00
02-17-2016	Robert J. Lowe, Jr.	Receive and respond to John Charkas opt in; forward to team; prepare update email to GDIT attorney Russell Bruch with updated request for Rule 34 compliance; receive auto generated mail from Bruch (no charge).	0.500	240.00
02-25-2016	Robert J. Lowe, Jr.	Preparation for telephone conference with GDIT counsel Russell Bruch including review of GDIT discovery responses, disclosures, objections and Bruch emails; outline talking points.	1.000	480.00
02-25-2016	Robert J. Lowe, Jr.	Telephone call with Russell Bruch re: Rule 34 issues and potential settlement.	0.500	240.00
02-26-2016	Robert J. Lowe, Jr.	Receive and review email from Kernan identifying GDIT deponents; prepare email to Kernan requesting draft deposition outlines and draft email updates to Marte and Ward.	0.250	120.00
03-09-2016	Robert J. Lowe, Jr.	Prepare for and conference call with GDIT attorney Russell Bruch.	0.500	240.00
03-10-2016	Robert J. Lowe, Jr.	Outline issues for upcoming settlement discussions with GDIT.	2.500	1,200.00
03-10-2016	Robert J. Lowe, Jr.	Prepare for and conference call with co-counsel Jay Ward and Pat Kernan: forward action and potential settlement of claims.	0.750	360.00
03-18-2016	Robert J. Lowe, Jr.	Prepare for discussions with plaintiffs re: prospective settlement.	0.750	360.00
03-21-2016	Robert J. Lowe, Jr.	Participate in conference calls with plaintiffs to discuss parameters of potential settlement.	3.000	1,440.00
		То	tal Fees:	40,680.00

**Time Summary** 

 Professional
 Hours
 Amount

 Robert J. Lowe, Jr.
 84.750
 40,680.00

 Total Fees:
 40,680.00

# **Expenses**

Date	Disbursement	Description	Amount
10-01-2015	None	Overnight delivery Federal Express to Fairfax (\$17.75)	17.75
01-19-2016	None	Postage to defense counsel DC, PA, Va.	40.35
02-11-2016	None	E108 - Postage to 8 SASE potential class action	9.60

Date	Disbursement	Description	Amount
		clients (\$5.68) plus 8 self addressed envelopes for return (\$3.92) totaling \$9.60 (see receipt of same date).	
03-14-2016	None	Postage to defense counsel DC, PA, Va. (\$5.58) - see receipt from 2/11/16.	5.58
		Total Disbursements:	73.28
Expense \$	Summary		
Disburseme	ent		Amount
None			73.28
		Total Disbursements:	73.28
		Total for this Invoice:	40,753.28



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Total Due:

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### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

JON J. MAKTE and MELISSA K. WAKD,	)
individually and on behalf of others	Civil Action No. 1:15cv1297-TSE-TCB
similarly situated,	)
	)
Plaintiffs,	
V.	)
GENERAL DYNAMICS INFORMATION	)
TECHNOLOGY, INC.,	) )
120111,02001, 11,0.,	, )
Defendant.	, )
	)

# DECLARATION OF ROBERT J. LOWE, JR. IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS

I, Robert J. Lowe, Jr., declare as follows:

1 MELICCA D. WADD.

- 1. I am the Managing Director of the law firm of Lowe & Associates, P.C. ("LoweFirm®"). I have acted as lead counsel to the Plaintiffs in this action.
- 2. I am submitting this Declaration in support of Plaintiffs' request for an award of attorneys' fees for services rendered in the above-captioned litigation and for reimbursement of costs and expenses incurred in connection with this litigation, as set forth in Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Memorandum in Support filed contemporaneously herewith.
- 3. LoweFirm's® compensation for the services rendered on behalf of Plaintiffs is wholly contingent, and the LoweFirm® has been completely at risk that it would not receive any compensation for prosecuting Plaintiffs' claims against Defendant General Dynamics Information Technology, Inc. ("GDIT").

- 4. I kept contemporaneous time records reflecting the time spent on this case and because I had associated two (2) other law firms and served as lead counsel, I made a conscious decision to reduce my billable entries related to coordination efforts with those two (2) firms.
- 5. The detailed time records reflecting the lodestar amount for the LoweFirm®'s attorney time spent on this matter, based on reduced hourly rates for our firm, are attached to the Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs as **Exhibit A**. The LoweFirm®'s fee and expense schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. None of the time included in this fee application represents any work done in connection with preparing this Declaration or otherwise related to petitioning for an award of attorneys' fees or seeking reimbursement of costs.
- 6. The rates at which the LoweFirm® seeks compensation, as set forth in Plaintiffs' Motion and Memorandum in Support, are likely below the usual and customary requests for attorney services in similar Fair Labor Standards Act ("FLSA") cases. Plaintiffs' Counsel agreed to reduce their attorneys' fees in order to achieve the settlement of this case.
- 7. All of the services performed by the LoweFirm® in connection with this litigation were reasonably necessary in the prosecution and ultimate settlement of this case. There has been no unnecessary duplication of services for which the firm now seeks compensation.
- 8. The expenses incurred by the LoweFirm® are attached to the Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs as **Exhibit A**. These expenses were reasonably and necessarily incurred in connection with this litigation.
- 9. The expenses incurred are reflected on the books and records of the LoweFirm®. These books and records are prepared from checks, expense vouchers, and other source

materials, which are regularly kept and maintained by the firm and accurately represent the expenses incurred.

10. At my direction, Plaintiffs' Counsel limited their total costs to \$1,000 in order to achieve the settlement of this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of April, 2016.

Robert J. Lowe, Jr.

# Patrick B. Kernan Kernan Professional Group, PLLC 717 D Street, NW

# Washington, DC 20004

# pkernan@kernanprofessionalgroup.com

# Billable Rate - \$300 per hour

	<b>Total Hours Matter</b>	Expenses	
	141.10	Filing Fee	\$400.00
<b>Total Hours August</b>		<b>Process Serv</b>	\$150.00
3.20		Pro Hac Fee	\$75.00
<b>Total Hours September</b>		GOVWIN	\$99.00
6.30		GOVWIN	\$99.00
<b>Total Hours October</b>			
23.10		Total	\$823.00
<b>Total Hours November</b>			
9.60			
<b>Total Hours December</b>			
7.00			
<b>Total Hours January</b>			
63.70			
<b>Total Hours February</b>			
18.20			
<b>Total Hours March</b>			
10.00			
	Total Houry Fee	¢42 330 00	

<b>Total Billable</b>	\$43,153.00
Total Expenses	\$823.00
Total Houry Fee	\$42,330.00

	August	
Date	Activity	Hours
8/5/15	Meeting with Plaintiffs to discuss	
	case and retainer, travel to and from	
	coordinating return of retainer.	2.70
8/27/15	Preparing pro hac vice paperwork	0.50

**Total Hours August** 

September			
Date	Activity	Hours	
9/12/15	Confirming and preparing case		
	initiation paperwork, emails and		
	phone calls to discuss case initiation.	4.70	
9/14/15	Conference call to discuss damages.	0.80	
9/15/15	Researching GDIT party to serve and		
	location and coordination of pay		
	stubs.	0.80	

**Total Hours September** 

	October	
Date	Activity	Hours
10/5/15	Travel to and reviewing complaint	
	with Plaintiffs.	2.50
10/7/15	Filing complaint with court, travel to	
	court, coordinating and arranging	
	process server.	2.70
10/12/15	Researching prior GDIT FLSA litigation.	2.00
10/13/15	Researching and coordinating with	
	plaintiff's on potential defenses in	
	offer letter.	4.50
10/17/15	Travel and meeting with Bob Lowe to	
	discuss next steps preparation for	
	case.	2.50
10/20/15	Researching to obtain copy of the	
	ITOM and EAGLE RFPs from GOVWIN	
	and review of same.	3.90
10/21/15	Preparing draft statement of facts for	
	conditional certification.	1.70
10/22/15	Preparing draft statement of facts for	
	conditional certification.	1.50
10/30/15	Filing of certificate of service.	1.80

**Total Hours October** 

November				
Date	Activity	Hours		
11/10/15	Travel to clerks office to file and pay			
	pro hac but it must be filed online.	1.50		
11/13/15	Review and analysis of of GDIT's			
	Answer, updating Plaintiffs.	1.40		
11/16/15	Conference call to discuss the case			
	and discussions with GDIT counsel on			
	scope of case.	0.9		
11/18/15	Review of draft discovery requests			
	and comments conference call with			
	Bob Lowe.	2.1		
11/23/15	Preparation of initial disclosure draft.	3.7		

**Total Hours November** 

December			
Date	Activity	Hours	
12/7/15	Conference call with Bob Lowe to		
	discuss next steps in view of		
	conference call with GDIT.	1.50	
12/10/15	Telephone conference to discuss		
	conditional certification.	0.5	
12/14/15	Review of draft motion for		
	conditional certification and		
	comments.	0.8	
12/17/15	Review contract and task order		
	numbers and descriptions on draft		
	discovery; review of FLSA overtime		
	exemptions.	0.8	
12/18/15	Review of GDIT discovery requests.	0.9	
12/22/15	Coordination with plaintiffs		
	concerning deposition dates;		
	preparing defense witness questions.	2.5	

**Total Hours December** 

	January	
Date	Activity	Hours
1/3/16	Review of discovery requests,	
	conference call with Bob Lowe, email	
	discovery to clients and coordinate	
	time to go over discovery responses	
	and depositions.	2.70
1/5/16	Review class certification motion and	
	provide comments.	0.50
1/7/16	Deposition prep with Melissa Ward,	
	review of memo on highly paid	
	employee exemption, initial disclosure	
	review and discovery prep.	3.50
1/8/16	Deposition prep Jon Marte, reviewing	
	Defendant's initial disclosures, and	
	objections to discovery objections, and	
	looking at discovery responses;	
	revising Plaintiff's initial disclosures.	3.80
1/10/16	Preparing responses to Defendant's	
	discovery requests.	1.80
1/11/16	Coordinating Discovery Responses	0.50
1/14/16	Preparation, attending deposition, and	
	travel	12.50
1/15/16	Preparing responses to Requests for	
	Production of Documents	1.50
1/15/16	Preparation, attending deposition, and	
	travel	12.00
1/18/16	Reviewing discovery responses and	
	obtaining signatures from Plaintiffs.	0.80
1/19/16	Calculating Marte Damages; preparing	
	attorney/client privilege log draft;	
	review of documents for discovery	
	responses references; review of	
	AECOM and SES production.	2.80
1/20/16	Research and edited attorney client	
	privilege log; review of GDIT discovery	
	responses.	3.60
1/22/16	Review GDIT's Motion in Opposition to	
	Class Certification	1.50

1/24/16	Providing comments and arguments	
	concerning GDIT brief; researching	
	issues, reviewing documents and	
	deposition summaries for evidence;	
	reviewing cases and summarizing.	4.80
1/25/16	Conference call to discuss brief	
	response and preparation for the call;	
	with attorneys and plaintiffs; setting	
	up conference call with plaintiffs, input	
	on Donahue declaration; review of	
	issues regarding proposed notice to	
	class	2.80
1/26/16	Modifying declarations as per	
	instructions of Bob Lowe; reviewing	
	evidence for declarations, reviewing	
	spreadsheets for individuals that	
	plaintiff's know.	2.40
1/27/16	Conference and preparation for call to	
	discuss declarations; analyzing Tier 1,	
	Tier 2, Tier 3 work; reviewing draft	
	declaration.	2.50
1/28/16	Emails and edits to declarations.	0.50
1/29/16	Meeting with plaintiffs, discussing	
	declarations, and obtaining signatures,	
	reviewing final brief.	3.20

**Total Hours January** 

February				
Date	Activity	Hours		
2/2/1	6 Review of GDIT motion to strike and			
	conference call regarding same;			
	research regarding collective			
	definition; review case law and			
	providing summaries.	3.20		
2/3/1	6 Review of proposed collective			
	stipulation especially regarding job			
	title.	0.6		
2/4/1	6 Review of documents in preparation			
	for hearing	1.8		
2/5/1	6 Travel, attend motion hearing before			
	the court, case research and			
	summary.	11.2		
2/26/1	6 Reviewing and providing list of			
	proposed GDIT depositions.	1.4		

**Total Hours February** 

	March	
Date	Activity	
3/1/16	Development deposition list and	
	preparing questions for each proposed	
	witness	1.1
3/2/16	Development deposition list and	
	preparing questions for each proposed	
	witness	1.8
3/17/16	Reviewing and summarizing GDIT	
	supplemental discovery documents	1.5
3/18/16	Conference calls and emails regarding	
	settlement.	0.5
3/20/16	Preparing spreadsheet of damages for	
	each plaintiff based on pay stubs and	
	statute of limitations	1.60
3/21/16	Conference call and coordination of	
	conference call with Plaintiffs to	
	discuss settlement. Confirmatory	
	emails concerning results of	
	discussion.	3.50

Total Hours March 10.00

From: order@iq.govwin.com

Subject: GovWin IQ PURCHASE RECEIPT Date: October 20, 2015 at 9:38 AM

To: pkernan@kernanprofessionalgroup.com



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GENERAL DYNAMICS CORPORATION, U.S. CITIZENSHIP AND IMMIGRATION \$99.00 SERVICES CONTRACT # HSHQDC06D00024, ORDER # HSHQDC07J00409

(ORDER & MODS 1-2) (PDF format, 15 pages)

Total: \$99.00

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#### **Purchaser Information**

Patrick Kernan <pkernan@kernanprofessionalgroup.com>
Attorney
Kernan Professional Group
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Washington, DC 20004
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202.759.9911

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From: order@iq.govwin.com

Subject: GovWin IQ PURCHASE RECEIPT Date: October 20, 2015 at 8:02 PM

To: pkernan@kernanprofessionalgroup.com



# The authority on government business

#### Thank you for your GovWin IQ purchase!

Order number: INP-ORD-201581278

ItemPriceDiscount Qty. TotalDownloadGENERAL DYNAMICS ONE SOURCE LLC - DEPARTMENT OF HOMELAND\$99.001 \$99.00Download

GENERAL DYNAMICS ONE SOURCE LLC - DEPARTMENT OF HOMELAND SECURITY CONTRACT # HSHQDC06D00024, TASK ORDER #

HSSCCG11J00088 (TASK ORDER, PWS, TASK ORDER MODS 1-7) (PDF

format, 236 pages)

Total: \$99.00

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#### **Purchaser Information**

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202.759.9911

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### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

individually and on behalf of others similarly situated,	Civil Action No. 1:15cv1297 -TSE-TCB
Plaintiffs,	
v.	
GENERAL DYNAMICS INFORMATION TECHNOLOGY, INC.,	
Defendant.	) ) )

# DECLARATION OF PATRICK B. KERNAN IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS

- I, Patrick B. Kernan, declare as follows:
- 1. I am the owner of Kernan Professional Group, PLLC (KPG). My firm has acted as counsel to Plaintiffs in this action.
- 2. I am submitting this Declaration in support of Plaintiffs' request for an award of attorneys' fees for services rendered in the above-captioned litigation and for reimbursement of costs and expenses incurred in connection with this litigation, as set forth in Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Memorandum in Support filed contemporaneously herewith.
- 3. My compensation for the services rendered on behalf of Plaintiffs is wholly contingent, and my firm has been completely at risk that it would not receive any compensation for prosecuting Plaintiffs' claims against Defendant General Dynamics Information Technology, Inc. ("GDIT").

- 4. I kept contemporaneous time records reflecting the time spent on this case.
- 5. The detailed time records reflecting the total lodestar amount for my attorney time spent on this matter, based on hourly rates for my firm, are attached to the Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs as **Exhibit A**. My fee and expense schedule was prepared from contemporaneous records regularly prepared and maintained by my firm. None of the time included in this fee application represents any work done in connection with preparing this Declaration or otherwise related to petitioning for an award of attorneys' fees or seeking reimbursement of costs.
- 6. The rates at which I seek compensation, as set forth in Plaintiffs' Motion and Memorandum in Support, are likely below the usual and customary requests for attorney services in similar Fair Labor Standards Act ("FLSA") cases. Plaintiffs' Counsel agreed to reduce their attorneys' fees in order to achieve the settlement of this case.
- 7. All of the services I performed in connection with this litigation were reasonably necessary in the prosecution and ultimate settlement of this case. There has been no unnecessary duplication of services for which the firm now seeks compensation.
- 8. The expenses I incurred are attached to the Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs as **Exhibit A**. These expenses were reasonably and necessarily incurred in connection with this litigation.
- 9. The expenses incurred are reflected on the books and records of my firm. These books and records are prepared from checks, expense vouchers, and other source materials, which are regularly kept and maintained by the firm and accurately represent the expenses incurred.

I declare under penalty of perjury that the foregoing is true and correct.					
Executed thisday of, 2016.					
	Path B. Keran				
				Patrick B. Kernan	

### 1037 Chuck Dawley Boulevard, Building A Mount Pleasant, SC 29464 Phone: 843-727-6500

Phone: 843-727-6500 Fax: 843-881-6183 Prebili

Marte Mr., Jon J.

Re: Marte Mr., Jon J. (224760-0)

Professional Services Through 4/11/16 As per Time Exhibit Attached		\$93,880.00
Costs Through 4/11/16		
Court Costs	225.00	
Internal Charges Copies / Prints	54.90	
Internal Charges Scanned Images	0.56	
Internal Charges Westlaw	1,591.60	
Online research	38.40	
Total Costs	••••••	\$1,910.46
Total Invoice		\$95 790 46

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
5/6/15	Review J. Ward, E. Westbrook email regarding potential FLSA case referred by B. Lowe (0,1)	0.10	400.00	40.00 BSW
7/1/15	Review FLSA computer exemption memo and research materials (0.5); telephone conference with J. Ward, B. Lowe and meeting with J. Ward (1.0)	1.50	400.00	600.00 BSW
7/3/15	Review J. Ward, B. Lowe emails regarding collective action complaint template, joint venture, and class reps (0.2)	0.20	400.00	80.00 BSW
7/8/15	Review B. Lowe email regarding SC plaintiffs (0.1)	0.10	400.00	40.00 BSW
7/14/15	Review B. Lowe email regarding P. Kernan and SC plaintiffs (0.1)	0.10	400.00	40.00 BSW
7/20/15	Review draft complaint from Bob Lowe (1.1), review Jay Ward's edits (.9), send comments to Bob Lowe (.2), review TAC Hargrove's memo regarding requirements for filing a complaint and discussions with TAC regarding same (.4)	2.60	500.00	1,300.00 EJW
7/21/15	Review update from Bob Lowe (.4); discussions in office (.3); review memos regarding FLSA preemption (.5); review Bob Lowe comments on preemption memo (.3); review memo regarding scheduling in the Eastern District of Virginia (.2)	1.70	500.00	850.00 EJW
7/22/15	Begin review of Kernan memo (.3), review attached cases and opinions (.2)	0.50	500.00	250.00 EJW
7/23/15	Review draft complaint and research memos (1.2)	1.20	400.00	480.00 BSW
7/30/15	Review opinions regarding FLSA and General Dynamics (1.1); comments regarding same (.4)	1.50	500.00	750.00 EJW
8/3/15	Review emails forwarded by J. Ward regarding strategy and filings (0.2); research on FLSA claims against government contractors and unique defenses (1.5); email to W. King regarding same and request for pleadings in Eagle Technologies action (0.1)	1.80	400.00	720.00 BSW
9/15/15	Review and revise draft complaint (1.5); email to J. Ward regarding revisions (0.1)	1.60	400.00	640.00 BSW
9/15/15	Review draft pleadings from Bob Lowe and suggest revisions thereon	1.50	500.00	750.00 EJW
9/16/15	Complete revision and comments on draft complaint (1.8)	1.80	400.00	720.00 BSW
9/16/15	Review proposed revisions to draft pleadings by Jay Ward and Bobby Wood	0.50	500.00	250.00 EJW
10/1/15	Review Mr. Low e-mail message regarding edits and comments to draft complaint and filing status	0.20	400.00	80.00 JLW
10/7/15	Review filed complaint; exchange e-mail messages with Messrs. Westbrook and Wood regarding same and pro hac applications; conference with Mr. King regarding same	0.80	400.00	320.00 JLW
10/8/15	Review J. Ward email regarding pro hac vice applications and draft discovery (0.1)	0.10	400.00	40.00 BSW
10/9/15	Review co-counsel emails regarding filing, judge selection, and scheduling meeting $(0.2)$	0.20	400.00	80.00 BSW

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
10/9/15	Exchange e-mail messages with co-counsel regarding filing, service, judge assignment, and meeting; review e-mail messages regarding general contractor liability for subcontractor failure to comply with FLSA	0.40	400.00	160.00 JLW
10/12/15	Review P. Kernan emails regarding GDIT records retention, subcontractor liability, defense counsel, class rep employment docs (0.3); meeting with co-counsel regarding strategy, employment docs, potential defenses, discovery (1.5); research regarding arbitration in FLSA cases (1.2); email exchange with E. Westbrook regarding same (0.1)	3.10	400.00	1,240.00 BSW
10/12/15	Prepare for meeting (.5); attend planning meeting with Bob Lowe, Pat Kernan, Jay Ward and Bobby Wood (1.0); review meeting materials afterwards (.5),	2.00	500.00	1,000.00 EJW
10/12/15	Conference with co-counsel regarding case background, status, and strategy; review research regarding enforceability of abritration agreements barring FLSA class actions	1.80	400.00	720.00 JLW
10/13/15	Review W. King email regarding pro hac vice requirements (0.1)	0.10	400.00	40.00 BSW
10/13/15	Conference with Mr. King regarding GDIT Cal. FLSA action involving overseas employees	0.10	400.00	40.00 JLW
10/15/15	Research regarding settlement with class rep mooting claims in FLSA cases and Symczyk opinion (1.0); email to J. Ward regarding same (0.1)	1.10	400.00	440.00 BSW
10/15/15	Conference with Mr. King regarding pro hac motions; review and complete pro hac application; review research regarding settlement offer to class rep mooting claim	0.70	400.00	280.00 JLW
10/16/15	Review B. Lowe email regarding employment docs for class reps, arbitration clauses (0.2)	0.20	400.00	80.00 BSW
10/16/15	Conference with Mr. King finalizing pro hac applications; draft e-mail message to Mr. Lowe forwarding same for filing; review e-mail message regarding class rep documents; review sample employment offer letter; review research regarding enforceability of arbitration clauses and class action waivers in employment agreements	1.00	400.00	400.00 JLW
10/19/15	Meeting regarding strategy, factual development, legal framework of brief, law clerk research project and multiple emails regarding same (1.0)	1.00	400.00	400.00 BSW
10/19/15	Review brief on collective action and assignments for work on our similar brief (.7); review of local rules (.3)	1.00	500.00	500.00 EJW
10/19/15	Review e-mail messages regarding preparation of motion for collective action certification; locate and draft e-mail message forwarding exemplar memo in support of same; review e-mail message requesting law clerk assistance regarding same	0.50	400.00	200.00 JLW
10/20/15	Review GDIT contract with DHS and modifications	0.40	400.00	160.00 JLW
10/21/15	Review P. Kernan emails regarding work descriptions and GDIT documents and review initial factual write-up (1.2)	1.20	400.00	480.00 BSW
10/21/15	Review draft statement of facts for memo in support of motion for collective action certification	0.40	400.00	160.00 JLW

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
10/22/15	Review emails regarding defense counsel and extension of time to answer (0.1)	0.10	400.00	40.00 BSW
10/22/15	Review e-mail messages regarding GDIT request for extension of time to answer; review draft motion and proposed order regarding same	0.20	400.00	80.00 JLW
10/26/15	Strategy planning	1.00	500.00	500.00 EJW
10/27/15	Conference with Jay Ward regarding case status, strategy, and attorney staffing	0.20	• 500.00	1 <b>00</b> .00 EJW
10/27/15	Conference with Mr. Westbrook regarding case status, strategy, and attorney staffing	0.20	400.00	80.00 JLW
10/28/15	Review B. Lowe email regarding pro hac vice applications (0.1)	0.10	400.00	40.00 BSW
10/28/15	Exchange e-mail messages with co-counsel regarding pro hac applications; coordinate payment of filing fees	0.20	400.00	80.00 JLW
11/2/15	Review and forward to co-counsel article on arbitrations (0.2)	0.20	400.00	80.00 BSW
11/3/15	Initial review of memo regarding FLSA cases regardingl collective action notice	1.00	500.00	500.00 EJW
11/3/15	Review draft memo in support of motion for collective action certification	0.70	400.00	280.00 JLW
11/11/15	Voicemail from R. Bruch and emails with co-counsel regarding same (0.2); meeting with J. Ward regarding R. Bruch voicemail (0.1)	0.30	400.00	120.00 BSW
11/11/15	Conference with Mr. Wood regarding contact from defense counsel; review e-mail messages with co-counsel regarding same	0.30	400.00	120.00 JLW
11/12/15	Review GDIT answer (0.5)	0.50	400.00	200.00 BSW
11/12/15	Exchange e-mail messages with co-counsel regarding status of pro hac applications; review GDIT answer; exchange e-mail messages with co-counsel regarding same	0.90	400.00	360.00 JLW
11/16/15	Conference call with E. Westbrook, B. Lowe, K. McElveen regarding B. Lowe initial phone call with defense counsel and strategy discussion (1.0); research Rule 68, review K. McElveen email and doc regarding rule 68, draft email regarding research assignment (0.5)	1.50	400.00	600.00 BSW
11/16/15	Attend conference with Bobby Wood and Katie McElveen (in person) and Bob Lowe (on the phone) concerning our review of Defendants' answer, our plans for discovery and collective action of certification motion and upcoming call by Bob with defense counsel (1); Review Judge Ellis' opinions in Route 777 Limited Partnership v. Total Hockey and American Bird Conservatory v. US Fish and Wildlife Service; make notes concerning same (.5)	1.50	500.00	750.00 EJW
11/16/15	Conference with Ms. McElveen regarding motion for collective action certification and intial discovery to defendants; review Judge Ellis opinions regarding attorneys' fees	0.80	400.00	320.00 JLW
11/16/15	Teleconference with E. Westbrook, B. Ward, and B. Lowe re: scheduling, conference preparation, discovery needed, and collective action certification briefing.	0.80	300.00	240.00 KM
11/16/15	Meet with E. Westbrook and B. Wood re: collective action certification briefing and research needed for Rule 68 issues	0.10	300.00	30.00 KM

Re: Marte Mr., Jon J. (224760-0)

Invoice for services rendered through 04/11/16

Prebill by stobias

Date	Work Description	Hours	Rate	Fees	Initials
11/17/15	Review B. Lowe email regarding call with R. Bruch (0.1); review co-counsel emails regarding discovery (0.3)	0.40	400.00	160.00	) BSW
11/17/15	Conversations with Bob Lowe concerning his conference with defense counsel, our strategy for collective action, our preparation of discovery and certification motion (.2); communications with Jay Ward, Bobby Wood, and Katie McElveen regarding preparation of discovery (.1); review Katie McElveen's first draft of discovery and comment thereon (.5)	0.80	500.00	400.00	) EJW
11/17/15	Review e-mail messages regarding status of draft discovery; forward draft discovery to Ms. McElveen for further editing; review and revise draft discovery; exchange e-mail messages with co-counsel regarding same; review Mr. Lowe e-mail message regarding telephone conference with defense counsel concerning scope of class and potential consent to collective action certification	2.10	400.00	840.00	) JLW
11/17/15	Complete initial draft of Plaintiff's First set of Interrogatories to GDIT; Girculate to J. Ward; B. Wood and E. Westbrook for review	1.10	300.00	330.00	) KM
11/17/15	Conduct file review and preliminary research in preparation for drafting brief in Support of collective action certification.	1.40	300.00	420.00	) KM
11/18/15	Meeting with J. Ward regarding draft discovery (0.1); review and revise draft discovery (1.0); review co-counsel emails regarding time to serve and respond to discovery (0.1); review E. Westbrook email regarding P. Kernan drafting initial disclosures (0.1)	1.30	400.00	520.00	) BSW
11/18/15	Conversation with Bob Lowe regarding eliminating interrogatories that may duplicate information required to be disclosed initially by defendant (.2); email to Jay Ward, Bobby Wood, and Katie McElveen regarding revisions to interrogatories as suggested by Bob Lowe (.1); email to attorney team regarding gathering information for our initial disclosures (.1); review Judge Ellis' opinion in Route 777 for guidance on his views on pleading and potential conflict of Rules 9 and 54 (.3); discussion with Bob Lowe regarding local rule timing on serving initial discovery (.1); review emails regarding discovery revisions, pro hac admissions, and strategy (.6)	1.40	500.00	700.04	0 EJW
11/18/15	Exchange e-mail messages with co-counsel regarding draft discovery requests; conferences with Mr. Wood regarding same; review and revise draft discovery requests; draft e-mail message to co-counsel forwarding same; exchange e-mail messages with co-counsel regarding same, initial disclosures, and rules governing timing of discovery	1.70	400.00	680.0	0 JLW
11/18/15	Review and incorporate all edits to draft discovery. Circulate revised draft to j. Ward, B. Wood and E. Westbrook for review	0.90	300.00	270.0	0 KM
11/19/15	Review E. Westbrook email regarding research on discovery on opt-in plaintiffs (0.1); review co-counsel emails regarding revisions to proposed discovery (0.2)	0.30	400.00	120.0	0 BSW
11/19/15	Emails to team regarding interrogatories (.1); email to team regarding draft motion for collective action (.1); begin review of collective action draft (.3)	0.50	500.00	250.0	0 EJW

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
11/19/15	Review e-mail messages regarding party status of FLSA opt-ins; review further revised memo in support of motion for collective action certification; review further revised draft interrogatories and RFPs; review orders granting pro hac vice applications	1.10	400.00	440.00 JLW
11/19/15	Edit Discovery to reduce number of interrogatories; circulate to team for review	0.30	300.00	90.00 KM
11/19/15	Drafting factual portion of collective action briefing along with section re; notice and conclusion	3.20	300.00	960.00 KM
11/20/15	Exchange e-mail messages with Mr. King regarding ECF registration	0.20	400.00	80.00 JLW
11/22/15	Research and email exchange with J. Searls regarding Rule 68 research (0.5)	0.50	400.00	200.00 BSW
11/23/15	Meeting with J. Ward regarding Rule 68 research update (0.1); review and respond to multiple J. Searls emails regarding Rule 68 research (0.5)	0.60	400.00	240.00 BSW
11/23/15	Review research regarding offer of judgment mooting claim; exchange e-mail messages with Mr. Wood regarding same	0.40	400.00	160.00 JLW
11/24/15	Email exchange with J. Searls regarding rule 68 research (0.2)	0.20	400.00	80.00 BSW
11/25/15	Review J. Searls rule 68 research memo and independent research regarding same (1.3); forward research and comments to co-counsel (0.1)	1.40	400.00	560.00 BSW
11/25/15	Review research memo regarding mooting effect of offer of judgment	0.40	400.00	160.00 JLW
11/30/15	Meeting with J. Ward regarding scope of collective action and other GDIT contracts (0.2); review multiple emails among co-counsel regarding same (0.2); meeting and emails with J. Ward regarding scope of collective action definition (0.3)	0.70	400.00	280.00 BSW
11/30/15	Emails to attorneys regarding motion to certify (.1); review memorandum regarding Rule 68 ability to moot collective action depending on timing of certification motion (.3); emails to attorneys regarding record keeping (.1); emails regarding case preparation (.1)	0.60	500.00	300.00 EJW
11/30/15	Review e-mail messages among co-counsel regarding timing of motion for collective action certification; exchange e-mail messages with Mr. Wood regarding necessary revisions to same re: class scope; conference with Mr. Wood regarding same; draft e-mail message to Mr. Westbrook regarding same; review Mr. Kernan e-mail message regarding initial disclosures	1.00	400.00	400.00 JLW
11/30/15	Review and respond to email from E. Westbrook re: certification briefing deadline.	0.10	300.00	30.00 KM
12/1/15	Review co-counsel emails regarding status and research regarding collective action certification and notice motion (0.2); meeting with J. Ward regarding scope of collection action and editing collection action certification motion (0.2); review P. Kernan draft factual statement and discuss with J. Ward (0.4); review and redline certification brief (1.0); email exchange with E. Westbrook, J. Ward, K. McElveen regarding GDIT offer to certify collective action (0.2); meeting with E. Westbrook regarding same (0.1)	2.10	400.00	840.00 BSW

Re: Marte Mr., Jon J. (224760-0)

Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees	Initials
12/1/15	Review Mr. Kernan revisions to collective action certification brief (0.2); conferences with Mr. Wood regarding same and class scope (0.4); exchange email messages with Messrs. Westbrook and Wood regarding same and status of stipulated collective action certification (0.2); review e-mail message from defendant regarding initial attorneys' conference (0.1); review and revise collective action certification brief (0.8)	1.70	400.00	680.0	00 JLW
12/1/15	review and respond to emails from team re: GDIT's potential stipulation conditional certification	0.10	300.00	30.6	00 KM
12/2/15	Meeting with J. Ward regarding collective action notice (0.4); research regarding collective action notice (0.5); draft collective action notice and forward to J. Ward for comments (1.0); review J. Ward comments regarding same (0.1)	2.00	400.00	800.0	00 BSW
12/2/15	Exchange e-mail messages with Mr. Wood regarding proposed notice of collective action (0.2); conference with Mr. Wood regarding same (0.4); review and revise draft notice (0.4); exchange e-mail messages with Mr. Wood regarding same (0.2)	1.20	400.00	480.0	00 JLW
12/3/15	Review E. Westbrook email regarding call with B. Lowe and strategy for filing (0.1)	0.10	400.00	40.	00 BSW
12/3/15	Review Bob Lowe draft outline for conference call with defense counsel tomorrow regarding deadlines, scope of discovery, protective orders, confidentiality, privilege and related matters (.3); emails to attorneys regarding preparation and final edits to motion for collective action (.2); conversation with Bob Lowe in preparation for conference with defense counsel covering strategy, possibility of conditional certification, preparation of our motion for collective action certification, status of potential interveners, status of our investigation, scope of discovery we would like, anticipated defense positions on discovery and potential responses thereto (.7); continue review of cases regarding possibility of mooting collective action by offer of settlement with representatives, effect of that offer following certification motion versus prior to certification motion (.3)	1.50	500.00	750.	00 EJW
12/3/15	Review draft joint discovery plan (0.3); review e-mail messages regarding tasks for finalizing motion for collective action certification, supporting memo, and proposed notice (0.2)	0.50	400.00	200.	00 JLW
12/4/15	Review E. Westbrook email recapping call with R. Bruch and strategy (0.1)	0.10	400.00	40.	00 BSW
12/4/15	Prepare for conference call with defense counsel by reviewing answer and our discovery outline (.3); conference call with defense counsel regarding initial ideas on discovery, motions, potential stipulated collective action (.5); conversations with Bob Lowe after conference with defense counsel on strategy, access to identities of other potential collective action members and related matters (.2); memo to other attorneys regarding conference call and planning (.1)	1.10	500.00	550.	00 EJW
12/4/15	Review Mr. Westbrook summary of initial attorneys' conf. regarding class definition, defenses, and discovery (0.2)	0.20	400.00	80.	00 JLW

Re: Marte Mr., Jon J. (224760-0)

Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees	Initials
12/7/15	Conference call with co-counsel regarding discovery issues, collective action motion, scheduling (1.5); discovery conference with J. Ward, K. McElveen, E. Westbrook (0.5); multiple emails exchanged with J. Ward, K. McElveen, E. Westbrook regarding draft collective action certification memo and proposed revisions (0.4)	2.40	400.00	960.0	00 BSW
12/7/15	Review and revise draft motion for collective action treatment (.6); email to attorneys regarding status of collective action memo (.1); conference with Bobby Wood and Jay Ward regarding report on conference with defense counsel and next steps (.4)	1.10	500.00	550.0	00 EJW
12/7/15	Review outline of research issues regarding class rep and opt-in plaintiff discovery (0.2); conference with Messrs. Westbrook and Wood regarding class scope, defenses, and discovery (0.4); research highly compensated employee exemption (0.4); exchange e-mail messages with Messrs. Westbrook & Wood and Ms. McElveen regarding necessary revisions to memo in support of motion for collective action certification (0.2)	1.20	400.00	480.4	00 JLW
12/8/15	Review court notices and co-counsel emails regarding discovery schedule (0.1); review and revise discovery requests and consult with co-counsel regarding same (0.6); exchange emails with J. Ward, E. Westbrook regarding discovery (0.1)	0.80	400.00	320.0	00 BSW
12/8/15	Review and revise draft interrogatories and requests for admissions (.3); review court order regarding initial conference, commencement of discovery (.2)	0.50	500.00	250.0	00 EJW
12/8/15	Conference with Ms. McElveen regarding memo in support of motion for collective action certification (0.2); review further revised draft of same (0.3); review order regarding pretrial conference (0.1); exchange e-mail messages with co-counsel regarding first interrogatories and RFPS (0.2); conference with Mr. Wood revising same (0.4); review Mr. Westbrook proposed revisions to same (0.2); exchange e-mail messages with Messrs. Westbrook and Wood regarding same and discovery scope (0.2)	1.60	400.00	640.	00 JLW
12/8/15	Conduct research re: certification of " exempt" status issue	0.90	300.00	270.0	00 KM
12/8/15	Conduct research re: certification of IT related cases	0.80	300.00	240.	00 KM
12/8/15	Major edits to legal portion of brief by consolidating language and arguments.	2.80	300.00	840.	00 KM
12/9/15	Review J. Ward, B. Lowe emails regarding pro hac vices and ECF notices (0.1); review GDIT task orders, contracts, and P. Kernan work description and consult with J. Ward regarding factual development (2.0); review B. Lowe update from conference call with R. Bruch regarding stipulation and administrator (0.2)	2.30	400.00	920.0	00 BSW
12/9/15	Exchange e-mail messages with co-counsel and Mr. King regarding ECF filing registration rules for pro hac attorneys (0.2); conference with Mr. Wood regarding scope of initial discovery (0.4); study subject GDIT contract and task order (1.0); exchange e-mail messages with Mr. Wood regarding analysis of same (0.2); review motion for collective action certification (0.1); review further revised memo in support of same (0.3); revise proposed class notice (0.4); exchange e-mail messages with co-counsel regarding same and status of GDIT proposed conditional certification stipulation (0.2)	2.80	400.00	1,120.	00 JLW

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Re: Marte Mr., Jon J. (224760-0)

Invoice for services rendered through 04/11/16

Date Work Description **Hours** Rate Fees Initials 12/9/15 Incorporate E. Westbrooks edits into collective action brief and draft motion for 1.10 300.00 330.00 KM certification; circulate to team. 12/10/15 Review GDIT draft stipulation for certification and notice (0.3); email exchange 1.30 400.00 520.00 BSW with co-counsel regarding same and review materials for job descriptions (1.0) 12/10/15 Review proposed stipulation from GDIT counsel (.2); email with thoughts on 0.50 500.00 250.00 EJW proposed stipulation to other attorneys (.2); review email from Bobby Wood regarding proposed stipulation (.1) 12/10/15 Review defendant's proposed stipulation for conditional certification and 0.80 400.00 320.00 JLW proposed notice (0.4); exchange e-mail messages with co-counsel regarding same, proper scope, and job descriptions (0.2); exchange e-mail messages with Mr. Wood regarding 2011 GDIT contract (0.2) 12/14/15 Review co-counsel emails regarding class members, subcontractors, discovery, 400.00 80.00 BSW 0.20 initial conference attendance (0.2) 12/14/15 Review email from Bob L concerning strategy (.1); memo to attorneys regarding 0.40 500.00 200.00 EJW revision of collective action brief and adding interrogatory on job titles to our discovery (.1); memo to attorneys regarding how expansive class definition we should seek and availability of representatives (.1); memo regarding upcoming initial conference with the court and number of attorneys who should attend (.1) 12/14/15 Review e-mail messages regarding class scope, job descriptions, proposed 0.20 400.00 80.00 JLW interrogatory regarding same, and initial disclosures (0.2) 12/15/15 Review P. Kernan draft initial disclosures (0.3); email exchange with J. Ward, 0.90 400.00 360.00 BSW K. McElveen regarding draft discovery edits (0.1); revise draft discovery and conference with K. McElveen regarding same (0.5) 0.80 500.00 400.00 EJW 12/15/15 Review revised discovery requests adding information concerning GDIT job titles and making other changes (.3); memo to attorneys regarding initial disclosures (.1); review draft initial disclosures and comments regarding same (.2); memo to Bob Lowe regarding conference call to discuss proposed collective action stipulation, draft discovery and draft collective action motion (.2)520.00 JLW 12/15/15 Review further revised first interrogatories and RFPs (0.2); conference with Mr. 1.30 400.00 Wood regarding same (0.2); review draft initial disclosures (0.2); review e-mail messages regarding potential subcontractor employee class rep (0.1); conference with Mr. Wood regarding conforming motion for collective action certification, notice, discovery requests, and initial disclosures (0.6) 12/15/15 Edit discovery requests to address E. Westbrooks comments of 12 4 and include 0.60 300.00 180.00 KM discovery re; job titles and descriptions. 90.00 KM 12/15/15 Conduct final review of Discovery, make final edits; and circulate to team. 0.30 300.00 12/15/15 Meet with B. Wood re: edits to discovery relating to subcontractors; Incorporate 0.20 300.00 60.00 KM

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edits and circulate to team.

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Date	Work Description	Hours	Rate	Fees Initials
12/16/15	Conference call with J. Ward, E. Westbrook, K. McElveen, P. Kernan, B. Lowe regarding discovery, disclosures, factual development, class certification motion, notice (1.5); meeting with J. Ward, K. McElveen, E. Westbrook regarding discovery (0.5)	2.00	400.00	800.00 BSW
12/16/15	Participate in conference with Jay Ward, Bobby Wood, Katie McElveen, Bob Lower and Pat Kernawn regarding case status, strategy, motion for collection action certification, discovery, initial discovery and disclosures (1.5)	1.50	500.00	750.00 EJW
12/16/15	Telephone conference with Messrs. Westbrook, Wood, Lowe, Kernan and Ms. McElveen regarding case status, strategy, class scope, motion for collective action certification, notice, discovery, and initial disclosures (1.5); conference with Messrs. Westbrook, Wood and Ms. McElveen revising first interrogatories and RFPs (0.5); review proposed final version of same (0.2); telephone conference with Messrs. Lowe, Westbrook, and GDIT counsel regarding proposed collective action stipulation and discovery plan (0.2); telephone conference with Messrs. Lowe and Westbrook regarding results of same and necessary follow-up tasks (0.5); research FLSA overtime exemptions (1.0); draft e-mail message to Mr. Westbrook regarding same (0.2)	4.10	400.00	1,640.00 JLW
12/16/15	Teleconference with J. Ward, B. Wood, E. Westbrook, B. Lowe and P. Kernan re; draft discovery; Motion for collective action , draft notice , case strategy, and research needed.	1.30	300.00	390.00 KM
12/16/15	Meet with J. Ward, B. Wood, E. Westbrook, B. Lowe and P. Kernan re; draft discovery and final edits to draft	0.50	300.00	150.00 KM
12/16/15	Incorporate final edits to discovery, proofread and circulate to team	0.30	300.00	90.00 KM
12/17/15	Meeting with J. Ward regarding FLSA exemptions (0.2); review J. Ward email and attached research regarding same (0.3); exchange emails with co-counsel regarding research assignments on FLSA exemptions (0.2); review co-counsel emails regarding draft 26f report (0.1); review revised draft 26f report and circulate suggested revisions (0.3); review P. Kernan revisions to draft discovery (0.1)	1.20	400.00	480.00 BSW
12/17/15	Compose and send email regarding research issues (.1); review GDIT proposed Rule 26(f) report and suggest edits (.3)	0.40	500.00	200.00 EJW
12/17/15	Conference with Mr. Wood regarding FLSA executive exemption (0.2); review and compile research regarding same and other exemptions (0.6); draft e-mail message to co-counsel forwarding same (0.1); review Mr. Westbrook e-mail messages regarding research issues concerning same (0.1); review GDIT proposed Rule 26(f) report and suggested edits thereto (0.4); review e-mail messages with GDIT counsel regarding same (0.1); review further revised interrogatories and RFPs (0.2); review Mr. Kernan's proposed additions to same (0.2)	1.90	400.00	760.00 JLW
12/17/15	Review and respond to emails from E. Westbrook re; law clerk research needed. Email research request to law clerk	0.10	300.00	30.00 KM
12/17/15	Review and edit Rule 26(f) report and submit to team	0.20	300.00	60.00 KM

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Re: Marte Mr., Jon J. (224760-0)

Invoice for services rendered through 04/11/16

12/24/15 Review notice cancelling initial pretrial conference (0.1)

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Date Work Description Hours Rate Fees Initials 12/18/15 Emails and meeting with J. Ward regarding revisions to draft discovery (0.4); 0.60 400.00 240.00 BSW review final revisions to discovery and coordinate service (0.2) 12/18/15 Exchange e-mail messages with Mr. Wood regarding proposed revisions to first 0.90 400.00 360.00 JLW interrogatories and RFPs (0.2); conference with Ms. McElveen regarding same (0.2); conference with Mr. Wood regarding same (0.2); review and revise same (0.2); coordinate service (0.1)12/20/15 Review R. Bruch, E. Westbrook emails regarding draft discovery schedule (0.1) 0.10 400.00 40.00 BSW 12/21/15 Review and exchange multiple emails with co-counsel regarding scheduling, 0.80 400.00 320.00 BSW discovery, collective action brief (0.6); meeting with J. Ward regarding collective action brief and schedule (0.2) 12/21/15 Exchange emails with Jay Ward and Bobby Wood regarding status of case and 0.20 500.00 100.00 EJW collective action certification motion revisions 12/21/15 Review GDIT's further revisions to Rule 26(f) report (0.2); review e-mail 0.70 400.00 280.00 JLW messages with GDIT agreeing to same (0.1); review e-mail messages with cocounsel regarding class rep depositions (0.1); review e-mail messages with GDIT regarding same (0.1); exchange e-mail messages with Messrs. Westbrook and Wood regarding status of and necessary revisions to collective action certification motion (0.2) 12/22/15 Review M. Puma, P. Kernan emails regarding deposition scheduling (0.1); 2.20 400.00 880.00 BSW review J. Searls memo regarding FLSA exemptions (0.5); email exchange with E. Westbrook, J. Ward regarding collective action memo revisions (0.2); review P. Kernan factual statement and supporting docs and exchange emails regarding same (1.2); meeting and emails with J. Ward regarding same (0.2) 12/22/15 Time for General Dynamics: Revisions to motion for collective action 0.80 500.00 400.00 EJW certification (.5); review emails regarding scheduling of discovery (.2); email regarding collective action brief (.1) 12/22/15 Review e-mail messages with GDIT regarding class rep depositions (0.1); revise 1.50 400.00 600.00 JLW memo in support of motion for collective action certification (0.4); exchange email messages with Messrs. Westbrook and Wood regarding same (0.2); review e-mail messages with Mr. Kernan regarding underlying contracts and task orders (0.2); conference with Mr. Wood regarding same (0.2); review research memo analyzing FLSA overtime exemptions (0.4) 12/23/15 Review J. Searls research on FLSA opt-ins and additional research assignments 0.30 400.00 120.00 BSW (0,2); review E. Westbrook, P. Kernan, M. Puma emails regarding deposition schedule (0.1) 12/23/15 Review research memo regarding party status of opt-in plaintiffs (0.3); review e-0.50 400.00 200.00 JLW mail messages among co-counsel regarding class definition, contracts, and task orders (0.2) 0.10 400.00 40.00 BSW 12/24/15 Review court notice regarding cancelled initial pretrial conf (0.1)

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0.10 400.00

40.00 JLW

Re: Marte Mr., Jon J. (224760-0)

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Date	Work Description	Hours	Rate	Fees Initials
12/28/15	Review P. Kernan draft deposition outline (0.4); review R. Bruch email regarding third party subpoenas (0.1); exchange emails with J. Searls regarding FLSA exemptions research assignment and provide factual background (0.4)	0.90	400.00	360.00 BSW
12/28/15	Review GDIT third-party subpoenas (0.2); review draft GDIT deposition outline (0.2); review scheduling order (0.2); exchange e-mail messages with Messrs. Wood and Searls regarding research issues (0.2)	0.80	400.00	320.00 JLW
12/28/15	Draft email to J. ward and B. Wood re: work needed on collective action certification briefing.	0.10	300.00	30.00 KM
12/29/15	Conference call with J. Ward, J. Searls regarding case overview and research assignments (0.4); meeting with J. Ward regarding contract and task order review (1.1); meeting with J. Ward regarding subcontractor liability issue (0.4); research regarding same and joint employer issue (0.6); review J. Ward email regarding same (0.1); review J. Ward email regarding contracts, task orders, and class reps (0.2); review deposition notices and subpoenas for class reps (0.2)	3.00	400.00	1,200.00 BSW
12/29/15	Draft e-mail message to Ms. McElveen regarding necessary revisions to memo in support of motion for collective action certification (0.2); telephone conference with Messrs. Wood and Searls regarding case background and research issues (0.4); research FLSA highly compensated employee exemption (0.6); draft e-mail message to Mr. Kernan outlining questions for class reps regarding same (0.2); review e-mail messages with plaintiff Ward regarding same (0.1); review notices of plaintiffs' depositions and subpoenas (0.2); conference with Mr. Wood analyzing contracts and tasks orders (1.0); research GDIT liability for subcontractor FLSA overtime violations (0.8); conferences with Mr. Wood regarding same (0.4); draft e-mail message to co-counsel regarding same (0.2)	4.10	400.00	1,640.00 JLW
12/30/15	Review multiple emails regarding class definition and subcontractor issues (0.2); conference call with co-counsel regarding same, discovery, and certification memo (0.5); meeting with J. Ward regarding certification motion, memo, and notice revisions (0.2); revise certification motion, memo, and notice consistent with meeting (0.4); exchange emails with co-counsel regarding same (0.2); review co-counsel emails regarding objections to discovery (0.1)	1.60	400.00	640.00 BSW
12/30/15	Exchange e-mail messages with co-counsel regarding GDIT liability for subcontractor FLSA overtime violations (0.2); telephone conference with Messrs. Lowe, Wood, and Kernan regarding same, motion for collective action certification, plaintiffs' depositions, and discovery responses (0.5); conference with Mr. Wood regarding necessary edits to motion for collective action certification, supporting memo, and proposed notice (0.2); review further revised versions of same (0.3); exchange e-mail messages with Mr. Wood and Ms. McElveen regarding same (0.2); review e-mail message regarding objections to discovery requests to plaintiffs (0.2); review local rules regarding same (0.2)	1.80	400.00	720.00 JLW
1/4/16	Meeting with K. McElveen regarding collective action cert brief and citations (0.1); review final draft of class cert papers (0.6); meeting with J. Ward regarding same (0.2)	0.90	400.00	360.00 BSW

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Date	Work Description	Hours	Rate	Fees	Initials
1/4/16	Review and revise draft objections to first interrogatories and RFPs to plaintiffs (0.4); exchange e-mail messages with Mr. Lowe regarding same (0.2); review further revised motion for collective action certification, supporting memo, and proposed notice (1.0); conference with Mr. Wood regarding same (0.2)	1.80	400.00	720.0	0 JLW
1/4/16	Incorporate J. Ward and B. Wood's final edits; conduct final proofread, check all citations, make final edits and circulate to J. Ward and B. Wood	2.70	300.00	810.0	0 KM
1/4/16	Discuss case law cited in colective action brief with B. Wood; Circulate final draft brief to co-consel	0.10	300.00	30.0	0 KM
1/5/16	Review J. Searls two memos and research on FLSA exemptions (0.8); meeting with J. Ward regarding same (0.2); multiple emails with co-counsel regarding final revisions to class cert papers (0.2); meeting with J. Ward regarding same (0.2)	1.40	400.00	560.0	0 BSW
1/5/16	Exchange e-mail messages with co-counsel regarding collective action motion issues (0.3); conference with Mr. Wood regarding same (0.2); review revised motion, supporting memo, and proposed notice (0.4); review research memo regarding highly compensated overtime exemption (0.3); conference with Mr. Wood regarding same (0.2)	1.40	400.00	560.0	0 JLW
1/5/16	Incorporate B. Lowes suggested edits into collective action certification briefing and re-circulate to team and co-counsel.	0.40	300.00	120.0	00 KM
1/5/16	Teleconference with B.Lowe re; the proposed notice to class members; email J. Ward and B. Wood re; same and respond to B.Lowe	0.30	300.00	90.0	00 KM
1/6/16	Review R. Bruch objections to Plaintiffs' discovery (0.3)	0.30	400.00	120.0	0 BSW
1/6/16	Review GDIT objections to first interrogatories and RFPs (0.4)	0.40	400.00	160.0	00 JLW
1/7/16	Review and edit draft protective order (0.5); email K. McElveen and J. Ward regarding same (0.1); meeting with K. McElveen regarding her edits to draft protective order (0.2); exchange emails with co-counsel regarding plaintiff Ward deposition prep (0.3); meeting with J. Ward regarding client deposition prep meetings tonight and Friday night, highly compensated employee exemption, discovery (0.5); conference call with plaintiff Ward regarding deposition prep (1.0)	2.60	400.00	1,040.0	00 BSW
1/7/16	Review court notice regarding required collective action motion hearing date and waiver of oral argument (0.1); review e-mail messages regarding same and class rep deposition prep (0.2); exchange e-mail messages with Messrs.  Westbrook and Wood regarding highly compensated exemption and class rep depositions (0.2); conference with Mr. Wood regarding same and class rep deposition prep (0.3); conduct deposition prep with Ms. Ward (1.8); telephone conference with Messrs. Lowe and Kernan following same (0.3); review and revise proposed confidentiality agreement and joint motion regarding same (0.4); review e-mail messages with GDIT finalizing same (0.2)	3.50	400.00	1,400.0	OO JLW
1/7/16	Review and edit joint motion for confidentiality order and proposed order; circulate to J. ward and B. Wood	0.30	300.00	90.0	00 KM

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
1/8/16	Meeting with J. Ward regarding update on remainder of plaintiff Ward deposition prep call (0.5); meeting with J. Ward, E. Westbrook regarding exemption research and deposition prep (0.5); review and edit initial disclosures and review K. McElveen redline (0.6); email exchange with J. Searls regarding highly compensated employee exemption (0.2); review J. Ward email regarding plaintiff Marte deposition prep (0.1)	1.90	400.00	760.00 BSW
1/8/16	Review email from Jay Ward regarding Mr. Marte deposition preparation	0.10	500.00	50.00 EJW
1/8/16	Review notice of hearing on motion for collective action certification (0.1); review Marte GDIT job offer letter (0.1); conduct deposition prep with Mr. Marte (0.8); draft e-mail message to Messrs. Westbrook and Wood regarding same (0.1); review GDIT's response to plaintiffs' objections to first interrogatories and RFPs (0.2); review e-mail messages with Mr. Searls regarding research issues concerning highly compensated employee exemption (0.1); review GDIT initial disclosures (0.2)	1.60	400.00	640.00 JLW
1/8/16	Review and edit draft initial disclosures; circulate to J. ward and B. Wood	0.30	300.00	90.00 KM
1/8/16	Comduct research re: Rule 26 and incorporate B. Woods edits into latest draft inital disclosures	0.30	300.00	90.00 KM
1/8/16	Conduct research re: Rule 26, and incorporate B. Woods; Edits into latest draft initial disclosures	0.30	300.00	90.00 KM
1/11/16	Review GDIT initial disclosures (0.3); email exchange with co-counsel regarding same and possible objections (0.2)	0.50	400.00	200.00 BSW
1/11/16	Review research regarding local rules concerning motions to compel (0.2); review e-mail messages regarding GDIT discovery objections and response to plaintiffs' objections (0.2)	0.40	400.00	160.00 JLW
1/11/16	Conduct legal research re: Motion to Compel (Fed. R. Cir. P. 37 & Legal Rule 37); Email team with findings.	0.40	300.00	120.00 KM
1/12/16	Review R. Bruch, B. Lowe, E. Westbrook emails regarding objections to GDIT's discovery requests (0.2); meeting with J. Ward regarding GDIT initial disclosures (0.2); email exchange and review legal research with J. Searls (0.5)	0.90	400.00	360.00 BSW
1/12/16	Conference with Mr. Wood regarding GDIT initial disclosures (0.2); review GDIT e-mail message regarding edits to joint motion for protective order and request for meet and confer regarding discovery objections (0.2); review research memo and cases regarding highly compensated employee exemption salary issue (0.4)	0.80	400.00	320.00 JLW
1/13/16	Review multiple emails regarding GDIT discovery requests regarding opt-ins (0.2); meeting with J. Ward, E. Westbrook regarding discovery on opt-ins and defense strategies (0.4); conference call with J. Ward, E. Westbrook, B. Lowe, P. Kernan regarding opt-in discovery, depositions, strategy (0.8); review J. Ward email and attached docs regarding FLSA exemptions and deposition topics for plaintiffs (0.2)	1.60	400.00	640.00 BSW

Re: Marte Mr., Jon J. (224760-0)

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Date Work Description Hours Rate Fees Initials 1/13/16 Conversation with Jay Ward and Bobby Wood regarding opt-in plaintiff 1.20 500.00 600.00 EJW solicitations and liability defenses (.4); participate in phone conference with Bob Lowe, Pat Kernan, Jay Ward and Bobby Wood regarding same, document prodiction, and plaintiff depositions (.8) 1/13/16 Review e-mail messages with GDIT regarding request for documents concerning 2.10 400.00 840.00 JLW opt-in plaintiff solicitations (0.2); conference with Messrs. Westbrook and Wood regarding same and liability defenses (0.4); telephone conference with Messrs. Lowe, Kernan, Westbrook and Wood regarding same, plaintiff document production, and plaintiff depositions (0.8); compile research regarding FLSA overtime exemptions (0.2); draft outline of anticipated plaintiff deposition questions regarding same (0.4); draft e-mail message to Messrs. Lowe and Kernan forwarding same for deposition preparation (0.1) 0.20 300.00 1/13/16 Meet with E. Westbrook re: GDIT's objections to Plaintiffs' discovery requests. 60.00 KM 1/13/16 Review GDIT's initial disclosures and objections to P's Discovery requests; 270.00 KM 0.90 300.00 Draft propsed letter to Def. Counsel and circulate to RPWB team 1/14/16 Review co-counsel emails regarding discovery dispute (0.2); review GDIT letter 1.40 400.00 560.00 BSW regarding same and cases cited therein, review J. Ward emails and attached case, and draft explanation to co-counsel (0.9); exchange emails with co-counsel regarding GDIT request for identity of class members contacted (0.3) 1/14/16 Research discoverability of opt-in plaintiff solicitations (0.5); exchange e-mail 560.00 JLW 1.40 400.00 messages with co-counsel regarding same and objections to production (0.2): review Marte document production (0.2); review Ward document production (0.2); review draft letter to GDIT regarding document production and meet and confer regarding discovery objections (0.2); review GDIT narrowed request regarding opt-in plaintiff solicitation discovery (0.1) 1/14/16 Review and respond to emails from team re: GDIT's response to our objections 0.20 300.00 60.00 KM to GDIIT's discovery requests. 1/15/16 Exchange emails with co-counsel regarding continued negotiations with GDIT 0.20 400.00 80.00 BSW on class member contact information (0.2) 1/15/16 Email exchanges with Jay Ward and Bobby Wood regarding GDIT request for 50.00 EJW 0.10 500.00 opt-in plaintiff solicitation information 1/15/16 Telephone conference with Mr. Lowe regarding GDIT request for opt-in 0.70 400.00 280.00 JLW plaintiff solicitation information (0.3); review e-mail messages with GDIT regarding same (0.1); exchange e-mail messages with Messrs. Westbrook and Wood regarding same (0.1); review entered protective order (0.2)1/18/16 Review e-mail message regarding possible stipulation concerning opt-in plaintiff 0.10 400.00 40.00 JLW solicitation discovery (0.1) 1/19/16 Review E. Westbrook email regarding FLSA hourly compensation issue (0.1); 120.00 BSW 0.30 400.00 review doc production forwarded by B. Lowe (0.2) 1/19/16 Conversation with Jay Ward regarding deposition results and discovery 150.00 EJW 0.30 500.00 responses

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Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initial
1/19/16	Compose and send email regarding class representative hourly compensation issues	0.10	500.00	50.00 EJW
1/19/16	Review Mr. Westbrook e-mail message regarding class rep hourly compensation issues (0.1); conference with Mr. Westbrook regarding class rep depositions, discovery responses, and FLSA overtime exemptions (0.4)	0.50	400.00	200.00 JLW
1/20/16	Review third party doc production forwarded by R. Bruch (0.4); review email exchange with co-counsel and forwarded research regarding discoverability of pre-suit communications with class members (0.4); meeting with J. Ward, K. McElveen regarding same (0.3)	1.10	400.00	440.00 BSW
1/20/16	Review plaintiffs' discovery responses, document productions, and privilege log (0.4); review AECOM and SES subpoena responses (0.2); review e-mail messages with GDIT regarding production of opt-in plaintiff solicitation information (0.2); exchange e-mail messages with co-counsel regarding same (0.2); review research regarding attorney-client privilege and attorney work product protection (0.2); review pre-suit communications with prospective plaintiffs (0.2); conferences with Ms. McElveen and Mr. Wood regarding research concerning discoverability of same (0.3); draft e-mail message to Mr. Westbrook regarding same (0.2)	1.90	400.00	760.00 JLW
1/20/16	Conduct legal research relatingtyo discovery privileges to be asserted in response to GDIT's objections to P's discovery responses.	2.40	300.00	720.00 KM
1/20/16	Meet with J. Ward and B. Wood to discuss research results and case strategy	0.80	300.00	240.00 KM
1/21/16	Review B. Lowe email proposal to R. Bruch regarding class member communications and privilege (0.1); review GDIT discovery responses and production (0.5); meeting with J. Ward regarding same (0.2)	0.80	400.00	320.00 BSW
1/21/16	Review e-mail message to GDIT proposing stipulation regarding disclosure of opt-in plaintiff solicitation information (0.1); review GDIT discovery responses (0.4); review GDIT document production (0.4); conferences with Mr. Wood regarding same (0.2)	1.10	400.00	440.00 JLW
1/22/16	Exchange emails regarding J. Searls research assignment (0.1)	0.10	400.00	40.00 BSW
1/22/16	Review e-mail message to Mr. Searles outlining additional FLSA overtime exemption research issues (0.1)	0.10	400.00	40.00 JLW
1/25/16	Review GDIT opposition to certification (1.0); email exchange with J. Ward regarding same (0.2); meeting with E. Westbrook, K. McElveen regarding GDIT opposition (0.2); meeting with C. Dukes regarding discretionary pay to exempt employee (0.2); email exchange with J. Ward, K. McElveen regarding research topics for reply to GDIT opposition to certification (0.2); meeting with C. Dukes regarding assisting K. McElveen on research topics (0.1); review B. Lowe email regarding Marte docs and deposition excerpts to review prior to conference call (0.2); conference call with co-counsel regarding reply to GDIT opposition and strategy (0.9)	3.00	400.00	1,200.00 BSW
1/25/16	Participate in telephone conference with Bob Lowe, Pat Kernan, Bobby Wood, Katie McElveen and Jay Ward regarding reply to GDIT's opposition brief and case strategy	0.90	500.00	450.00 EJW

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
1/25/16	Review GDIT opposition to motion for collective action certification and supporting documents (0.6); exchange e-mail messages with Mr. Wood regarding same (0.1); telephone conference with co-counsel regarding same (1.1); review outline of research issues for collective action reply (0.2); review deposition excerpts and documents for reply (0.4); review proposed revised notice (0.2)	2.60	400.00	1,040.00 JLW
1/25/16	Review GDIT's opposition to Motion for Collective action certification	0.70	300.00	210.00 KM
1/25/16	Teleconference with R. Lowe, P. Kernan, E. Westbrook, B. Wood, and J. Ward re; reply to GDIT's opposition brief and case strategy re: same	0.90	300.00	270.00 KM
1/26/16	Further review of Marte docs and email exchange with co-counsel regarding class definition issues (0.5); meeting with C. Dukes, K. McElveen regarding research assignments and class definition issues (0.3)	0.80	400.00	320.00 BSW
1/26/16	Analyze collective action certification issues (0.4); review documents regarding job classifications and descriptions (0.2); exchange e-mail messages with cocunsel regarding same, class definition, and collective action reply brief (0.2); review memo analyzing collective action reply issues (0.3)	1.10	400.00	440.00 JLW
1/26/16	Review and respond to emails from team re: reply brief and case strategy.	0.70	300.00	210.00 KM
1/26/16	Begin conductig legal research and drafting reply brief.	3.20	300.00	960.00 KM
1/27/16	Review C. Dukes email regarding analysis of employee duties and class definition (0.1); review draft Ward declaration and exchange multiple emails with co-counsel regarding same (0.6); meeting with J. Ward, K. McElveen regarding same (0.2); draft email to B. Lowe regarding draft declarations (0.1); meeting with J. Ward, C. Dukes regarding analysis of employee duties and class definition (0.2)	1.20	400.00	480.00 BSW
1/27/16	Review draft Ward declaration in support of collective action certification (0.2); exchange e-mail messages with co-counsel regarding same (0.2); conference with Mr. Wood and Ms. McElveen regarding same (0.2); review memo regarding collective action reply issues, class definition, and exemptions (0.3); conferences with Messrs. Dukes and Wood regarding same (0.2); review Marte and Ward deposition summaries (0.4); exchange e-mail messages with co-counsel regarding same (0.2)	1.70	400.00	680.00 JLW
1/27/16	Review email from B.Lowe along with attached draft declaration. Forward same to team. Draft email to B.Lowe re: declaration.	0.30	300.00	90.00 KM
1/27/16	Continue research and drafting reply brief	3.70	300.00	1,110.00 KM
1/28/16	Review Ward and Marte further revised draft declarations and emails with co- counsel regarding same (1.0); exchange emails with K. McElveen regarding Marte docs (0.1)	1.10	400.00	440.00 BSW
1/28/16	Work on FLSA reply brief (.5); review numerous emails regarding FLSA draft brief (.4)	0.90	500.00	450.00 EJW

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees	Initials
1/28/16	Review and revise Marte and Ward declarations in support of motion for collective action certification (1.7); exchange e-mail messages with co-counsel regarding same (0.2); review further revised versions (0.4); review draft reply in support of motion for conditional certification (0.2)	2.50	400.00	1,000.0	00 JLW
1/28/16	Continue research and drafting reply brief. Submit to team and co-counsel for review	6.40	300.00	1,920.0	00 KM
1/29/16	Review revised draft reply to GDIT opposition to certification (0.4); review B. Lowe emails regarding Ward and Marte declarations (0.1); meeting with J. Ward, E. Westbrook, K. McElveen, C. Dukes regarding declarations, reply certification brief (0.4); exchange emails with co-counsel regarding Ward and Marte declaration drafts and reply certification brief (0.4); review and highlight Marte declaration revisions (0.2)	1.50	400.00	600.0	00 BSW
1/29/16	Participate in conference with Jay Ward, Bobby Wood, Katie McElveen and Chuck Dukes regarding status of plaintiffs' declarations and revisions to reply in support of motion for collective action certification (.4); review emails from cocounsel and attorneys regarding Marte declaration (.2)	0.60	500.00	300.0	00 EJW
1/29/16	Review Mr. Lowe e-mail messages regarding status of Marte and Ward declarations (0.2); conference with Messrs. Westbrook, Wood, Dukes and Ms. McElveen regarding same and necessary revisions to reply in support of motion for collective action certification (0.4); review revised reply (0.3); review revised Marte declaration (0.2); exchange e-mail messages with Ms. McElveen regarding further necessary revisions to reply (0.1); conference with Ms. McElveen regarding same (0.2); review and revise reply (0.3); draft e-mail message to Mr. Lowe forwarding same for filing (0.1); review GDIT confidentiality designations (0.1)	1.90	400.00	760.0	00 JLW
1/29/16	Meet with team re; draft reply brief; Edit reply brief and re-circulate to team for review.	0.90	300.00	270.0	00 KM
2/1/16	Exchange emails with J. Ward, K. McElveen regarding J. Searls research on FLSA computer exemption (0.1); review R. Bruch email regarding striking Plaintiffs' declarations and multiple emails with co-counsel regarding same (0.3); meeting with J. Ward regarding same (0.2)	0.60	400.00	240.0	00 BSW
2/1/16	Review email from Bob Lowe regarding telephone call with defense counsel (.2); review email regarding fourth circuit case from Bob Lowe (.3)	0.50	500.00	250.0	00 EJW
2/1/16	Review correspondence regarding GDIT proposed motion to strike declarations and conditional certification hearing rescheduling (0.1); conference with Ms. McElveen regarding same (0.2); exchange e-mail messages with co-counsel regarding same (0.2); conference with Mr. Wood regarding same (0.2); review correspondence with GDIT regarding same (0.1); review preliminary research regarding admissibility of class rep declarations (0.2)	1.00	400.00	400.6	00 JLW

Re: Marte Mr., Jon J. (224760-0)

Invoice for services rendered through 04/11/16

Date Work Description Hours Rate Fees Initials 2/2/16 Review B. Lowe email describing conference call with R. Bruch regarding 1.70 400.00 680.00 BSW GDIT motion to strike stipulated class certification and co-counsel emails regarding same (0.2); meeting with J. Ward regarding same (0.2); conference call with J. Ward, K. McElveen, B. Lowe, P. Kernan regarding same (0.8); review K. McElveen memo regarding declaration admissibility (0.2); exchange emails with J. Ward, E. Westbrook, K. McElveen regarding stipulated class cert issues (0.3)2/2/16 Phone conversation with Jay Ward regarding conditional certification issues (.2); 0.60 500.00 300.00 EJW email exchanges with attorneys regarding same (.3) review email from Bob Lowe regarding research issue (1) 2/2/16 Review Mr. Lowe e-mail messages regarding discussion with GDIT and 2.30 400.00 920.00 JLW proposed stipulated conditional certification (0.2); exchange e-mail messages with co-counsel regarding same and admissibility of class rep declarations (0.2); conference with Mr. Wood regarding same (0.2); telephone conference with Messrs. Lowe, Kernan, Wood and Ms. McElveen regarding same (0.8); review email messages with GDIT regarding further discussions concerning same (0.1); review research memo regarding admissibility of class rep declarations (0.2); telephone conference with Mr. Westbrook regarding conditional certification issues and options (0.2); exchange e-mail messages with Messrs. Westbrook and Wood and Ms. McElveen analyzing same (0.3); review Mr. Lowe e-mail message following further discussion with GDIT regarding same (0.1) 2/2/16 Conduct legal research re: viability of Motion to Strike use of declarations in 1.30 300.00 390.00 KM reply brief: Email findings to team and Co-Counsel 2/2/16 Teleconference with J. Ward, B. Wood, B. Lowe and P. Kernan re: case strategy 0.70 300.00 210.00 KM for upcoming hearing 2/3/16 Review GDIT's proposed stipulation regarding conditional certification (0.3); 0.80 400.00 320.00 BSW meeting with J. Ward regarding same (0.2); email exchange with co-counsel regarding same (0.2); review R. Bruch email regarding status of hearing (0.1) 2/3/16 Review email from defense counsel regarding conference (.2); review email 0.50 500.00 250.00 EJW from co-counsel regarding same (.1); review email from Jay Ward regarding stipulation on conditional certification (.2) 2/3/16 Study GDIT proposed stipulation for conditional certification and proposed 1.10 400.00 440.00 JLW notice (0.3); conference with Mr. Wood regarding same (0.2); exchange e-mail messages with co-counsel regarding same (0.2); review e-mail messages with GDIT accepting stipulation (0.1); review filed stipulation and proposed notice (0.1); review revised memo regarding case status and strategy (0.2)2/4/16 Review order regarding stipulation and hearing (0.1); meeting with J. Ward 1.30 400.00 520.00 BSW regarding same (0.2); email exchange with co-counsel regarding conference call and strategy (0.1); review C. Dukes research regarding whether exemptions are question of law (0.1); conference call with J. Ward, B. Lowe, C. Dukes regarding hearing preparation and strategy (0.8) 2/4/16 Phone conversation with Jay Ward regarding hearing preparation 0.20 500.00 100.00 EJW

Prebill

Prebill by stobias Page 19 4/11/16 12:35 PM

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
2/4/16	Review order taking stipulation for conditional certification under advisement and directing parties to appear at hearing (0.1); review e-mail messages regarding same (0.1); conference with Mr. Wood regarding same (0.2); conference with Mr. Dukes regarding research issues for hearing (0.2); review research results (0.2); telephone conference with Messrs. Lowe, Wood, and Dukes in preparation for hearing (0.8); telephone conference with Mr. Westbrook regarding same (0.2)	1.80	400.00	720.00 JLW
2/5/16	Conference call with co-counsel regarding conditional certification hearing (0.3)	0.30	400.00	120.00 BSW
2/5/16	Telephone conference with Mr. Lowe regarding hearing on motion for conditional certification and next steps (0.3); draft e-mail message to Mr. Westbrook regarding same (0.1)	0.40	400.00	160.00 JLW
2/8/16	Review orders regarding stipulated conditional cert (0.1)	0.10	400.00	40.00 BSW
2/8/16	Review order on joint motion for stipulated conditional certification (0.1)	0.10	400.00	40.00 JLW
2/9/16	Review R. Bruch email and proposed order regarding conditional cert (0.2); review R. Bruch, B. Lowe emails regarding same and judge's instructions at hearing (0.1)	0.30	400.00	120.00 BSW
2/9/16	Review proposed order for conditional certification and proposed notice (0.2); review e-mail messages with GDIT regarding same (0.1); review email from Katie McElveen regarding same (.1)	0.40	500.00	200.00 EJW
2/9/16	Review proposed order for conditional certification and proposed notice (0.2); review e-mail messages with GDIT regarding same (0.1)	0.30	400.00	120.00 JLW
2/10/16	Review filed notice and order regarding conditional cert (0.1)	0.10	400.00	40.00 BSW
2/10/16	Review order granting motion for stipulated conditional certification	0.10	500.00	50.00 EJW
2/10/16	Review order granting motion for stipulated conditional certification (0.1)	0.10	400.00	40.00 JLW
2/11/16	Review notice list (0.1)	0.10	400.00	40.00 JLW
2/17/16	Review e-mail message to GDIT regarding notice and document production issues	0.10	400.00	40.00 JLW
2/19/16	Review GDIT e-mail message regarding document production issues (0.1); review Marte and Ward W-2s (0.1)	0.20	400.00	80.00 JLW
2/25/16	Review B. Lowe email and attached notice and opt-ins (0.1)	0.10	400.00	40.00 BSW
2/25/16	Exchange emails with Jay Ward regarding GDIT status of notice and opt-ins	0.10	500.00	50.00 EJW
2/25/16	Review e-mail message to GDIT regarding status of notice and opt-ins (0.1); exchange e-mail messages with Mr. Westbrook regarding same (0.1)	0.20	400.00	80.00 JLW
2/26/16	Review discovery requests to opt-in plaintiffs	0.20	400.00	80.00 JLW
3/3/16	Review J. Ward email regarding opt-in inquirey from B. Lowe (0.1)	0.10	400.00	40.00 BSW
3/3/16	Exchange e-mail messages with Mr. Lowe regarding necessity of filing consents to join lawsuit $(0.1)$ ; compile and forward sample filing $(0.1)$	0.20	400.00	80.00 JLW
3/9/16	Exchange e-mail messages with Mr. Lowe regarding preliminary settlement discussions	0.10	400.00	40.00 JLW

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Date	Work Description	Hours	Rate	Fees Initials
3/10/16	Review J. Ward email regarding status of opt-ins and call with B. Lowe (0.1); review B. Lowe email regarding settlement discussions (0.1)	0.20	400.00	80.00 BSW
3/10/16	Telephone conference with Messrs. Lowe and Kernan regarding opt-in status and discovery, summary judgment issues, damages, and settlement options (0.5); draft e-mail message to Messrs. Westbrook and Wood regarding same (0.1); review correspondence to GDIT proposing settlement (0.1)	0.70	400.00	280.00 JLW
3/11/16	Review email correspondence between R. Bruch, B. Lowe regarding settlement discussions (0.1)	0.10	400.00	40.00 BSW
3/11/16	Review GDIT correspondence regarding settlement demand	0.10	400.00	40.00 JLW
3/14/16	Review opt-in plaintiffs' objections to GDIT discovery requests (0.2); review email messages with GDIT regarding status of opt-ins (0.1)	0.30	400.00	120.00 JLW
3/16/16	Review GDIT supplemental document production regarding opt-in plaintiffs Charcas and Pierce (0.2); review GDIT subpoena to AECom regarding Charcas and Pierce records (0.1)	0.30	400.00	120.00 JLW
3/18/16	Exchange e-mail messages with co-counsel regarding GDIT settlement offer and proposed counteroffer (0.2)	0.20	400.00	80.00 JLW
3/21/16	Review Bob Lowe email regarding settlement discussions	0.10	500.00	50.00 EJW
3/21/16	Review e-mail message from Mr. Lowe outlining status of settlement negotiations and discussions with clients regarding same (0.1)	0.10	400.00	40.00 JLW
3/23/16	Review Bob Lowe email regarding settlement term sheet	0.10	500.00	50.00 EJW
3/23/16	Review Mr. Lowe e-mail message outlining final settlement terms (0.1)	0.10	400.00	40.00 JLW
3/28/16	Review settlement term sheet	0.10	500.00	50.00 EJW
3/28/16	Review settlement term sheet (0.2)	0.20	400.00	80.00 JLW
	Total	237.60		93,880.00

## Payable Expense Exhibit

Re: Marte Mr., Jon J. (224760-0) Invoice for charges rendered through 04/11/16

Date	Description	Check	Amount
Court (	Costs		
11/2/	15 Kernan Professional Group - Reimbursement for Pro Hac Vice Application Fees USDC EDVA (3 at \$75)	138459	225.00
	Total		225.00

## **Charges Exhibit**

Re: Marte Mr., Jon J. (224760-0) Invoice for charges rendered through 04/11/16

Date Charge Description				Amount	
Internal Charges Copies / Prints					
10/12/15 Internal Charges Copies/Prints		5.00	0.15	0.75	
10/13/15 Internal Charges Copies/Prints		77.00	0.15	11.55	
10/15/15 Internal Charges Copies/Prints		1.00	0.15	0.15	
10/16/15 Internal Charges Copies/Prints		4.00	0.15	0.60	
10/28/15 Internal Charges Copies/Prints		13.00	0.15	1.95	
11/3/15 Internal Charges Copies/Prints		5.00	0.15	0.75	
11/30/15 Internal Charges Copies/Prints		4.00	0.15	0.60	
12/9/15 Internal Charges Copies/Prints		4.00	0.15	0.60	
12/18/15 Internal Charges Copies/Prints		18.00	0.15	2.70	
1/5/16 Internal Charges Copies/Prints		51.00	0.15	7.65	
1/7/16 Internal Charges Copies/Prints		4.00	0.15	0.60	
1/26/16 Internal Charges Copies/Prints		164.00	0.15	24.60	
1/28/16 Internal Charges Copies/Prints		16.00	0.15	2.40	
	Total	366.00	0.15	54.90	
Internal Charges Scanned Images					
10/13/15 Internal Charges Scanned Images		4.00	0.01	0.04	
10/16/15 Internal Charges Scanned Images		4.00	0.01	0.04	
11/3/15 Internal Charges Scanned Images		4.00	0.01	0.04	
12/18/15 Internal Charges Scanned Images		19.00	0.01	0.19	
4/6/16 Internal Charges Scanned Images		25.00	0.01	0.25	
	Total	56.00	0.01	0.56	
Internal Charges Westlaw					
7/22/15 Westlaw Online		0.00	0.00	375.61	
Research/999991.TRW.gendynami	cs/J. Ward				
11/23/15 Westlaw Online Research		0.00	0.00	91.34	
1/13/16 Westlaw Online Research		0.00	0.00	255.20	
1/13/16 Westlaw Online Research		0.00	0.00	239.10	
1/13/16 Westlaw Online Research		0.00	0.00	63.80	
2/16/16 Westlaw Online Research		0.00	0.00	248.53	
2/16/16 Westlaw Online Research		0.00	0.00	178.99	
3/16/16 Westlaw Online Research		0.00	0.00	139.03	
	Total	0.00	0.00	1,591.60	
Online research					
1/25/16 Online research - Pacer		0.00	0.00	37.70	

## **Charges Exhibit**

Re: Marte Mr., Jon J. (224760-0) Invoice for charges rendered through 04/11/16

Date Charge Description				Amount	
1/25/16 Online research - Pacer		0.00	0.00	0.70	
	Total	0.00	0.00	38.40	
	Total			1.685.46	

#### Time Allocation Exhibit

Re: Marte Mr., Jon J. (224760-0) Invoice for services rendered through 04/11/16

Timekeeper Name		Hours	Rate	Fee	ID
Wood, Bobby S.		75.80	400.00	\$30,320.00	BSW
Westbrook, Edward J.		34.00	500.00	\$17,000.00	EJW
Ward, Jay		82.20	400.00	\$32,880.00	JLW
McElveen, Katie		45.60	300.00	\$13,680.00	KM
	Totals	237.60		\$93,880.00	

## Payable Expense Exhibit

Re: Marte Mr., Jon J. (224760-0) Invoice for charges rendered through 04/11/16

Date Description	Check	Amount
Court Costs  11/02/15 Kernan Professional Group - Reimbursement for Pro Hac Vice Application Fees USDC EDVA (3 at \$75)	138459	225.00
Total		225.00

# FIGURE RICHARDSON PATRICK WESTBROOK, BRICKMAN H.C.

1037 Chuck Dawley Blvd Bldg A; Box 1007 Mount Pleasant, SC 29465-1007 (843) 727-6500

Regions Bank - Operating Charleston, SC 29401 67-181/532 \*\*Not Valid after 180 days\*\*

138459

Date

Amount

11/2/15

\*\*\*\$225.00

Pay to the Order Of

Kernan Professional Group 717 D Street, NW

Pay Exactly Two hundred twenty five and 00/100 Dollars

009400

Washington DC 20004

AND THE PARTY OF T ## 138459# #053201814# 3904078551#

009400		Kernan Professional Group	<u>\$225.00</u>	11/2/15	138459
		Kernan Professional Group - Reimbursement f	\$225.00		
	510100	Litigation Expenses			
	224760	Marte Mr., Jon J.			
	0	Marte Mr. Jon J			

## RICHARDSON, PATRICK, WESTBROOK & BRICKMAN

## **CHECK REQUEST FORM**

Yevnan Prof. Evenp" Payee: Patrick J. Kernan, Esq.

8309 Holly Haven Lane Fairfax Station, VA 22039

Requested By: wking

Date Requested: 10-28-2015 recoll 27

Return Check to: wking

TASK CODE	CLIENT NO.	CLIENT NAME	DESCRIPTION	AMOUNT
E018	224760	Marte	Pro hac vice application fees USDC EDVA \$75.00 X 3	\$225.00
	\$225.00			

BILL King

#### William King

From:

Jay Ward

Sent:

Wednesday, October 28, 2015 4:12 PM

To:

William King

Subject:

FW: GDIT EDVA PHV Application

Please see below and request a check for the pro hac filing fees payable to Pat and send to him. Thanks.

From: Rob Lowe [mailto:rlowe@lowefirm.com]
Sent: Wednesday, October 28, 2015 4:11 PM

To: Jay Ward

**Cc:** Edward Westbrook; Bobby Wood; Kpg **Subject:** Re: GDIT EDVA PHV Application

Jay and Ed:

Pat will file your executed *pro hac vice applications* along with his as well as the original affidavit of service that was inadvertently delayed.

Please send your check for the fees directly to Pat at:

Patrick J. Kernan, Esquire 8309 Holly Haven Lane Fairfax Station Va. 22039

Recognizing that it is close to your staff's quitting time, I don't think another day will make a difference since we are not dealing with a deadline vis a vis the AOS.

Happy Halloween!

Bob

On Oct 16, 2015, at 2:28 PM, Jay Ward < <u>iward@rpwb.com</u>> wrote:

Bob,

I hope this finds you well. Our executed *pro hac* applications are attached. Can you executive and file each separately and pay the filing fees through ECF? We can send you a check for the fees or deal with that in any other way you prefer.

Thanks,

Jay Ward Richardson, Patrick, Westbrook & Brickman, LLC 843-727-6682 jward@rpwb.com

<Edward Westbrook Executed PHV Application EDVA.pdf><James Ward Executed PHV Application EDVA.pdf><Robert Wood Executed PHV Application EDVA.pdf>

Robert J. Lowe, Jr. LOWE & ASSOCIATES, P.C. P.O. Box 21556 Charleston, SC 29413-1556 T: (843) 725-4500; F: (843) 725-4508 www.lowefirm.com



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## **Charges Exhibit**

Re: Marte Mr., Jon J. (224760-0) Invoice for charges rendered through 04/11/16

Date Charge Description			Amount	
Internal Charges Copies / Prints			•	
10/12/15 Internal Charges Copies/Prints	5.00	0.15	0.75	
10/13/15 Internal Charges Copies/Prints	77.00	0.15	11.55	
10/15/15 Internal Charges Copies/Prints	1.00	0.15	0.15	
10/16/15 Internal Charges Copies/Prints	4.00	0.15	0.60	
10/28/15 Internal Charges Copies/Prints	13.00	0.15	1.95	
11/03/15 Internal Charges Copies/Prints	5.00	0.15	0.75	
11/30/15 Internal Charges Copies/Prints	4.00	0.15	0.60	
12/09/15 Internal Charges Copies/Prints	4.00	0.15	0.60	
12/18/15 Internal Charges Copies/Prints	18.00	0.15	2.70	
01/05/16 Internal Charges Copies/Prints	51.00	0.15	7.65	
01/07/16 Internal Charges Copies/Prints	4.00	0.15	0.60	
01/26/16 Internal Charges Copies/Prints	164.00	0.15	24.60	
01/28/16 Internal Charges Copies/Prints	16.00	0.15	2.40	
Total	366.00	0.15	54.90	
Internal Charges Scanned Images				
10/13/15 Internal Charges Scanned Images	4.00	0.01	0.04	
10/16/15 Internal Charges Scanned Images	4.00	0.01	0.04	
11/03/15 Internal Charges Scanned Images	4.00	0.01	0.04	
12/18/15 Internal Charges Scanned Images	19.00	0.01	0.19	
04/06/16 Internal Charges Scanned Images	25.00	0.01	0.25	
Total	56.00	0.01	0.56	
Internal Charges Westlaw				
07/22/15 Westlaw Online	0.00	0.00	375.61	
Research/999991.TRW.gendynamics/J. Ward				
11/23/15 Westlaw Online Research	0.00	0.00	91.34	
01/13/16 Westlaw Online Research	0.00	0.00	255.20	
01/13/16 Westlaw Online Research	0.00	0.00	239.10	
01/13/16 Westlaw Online Research	0.00	0.00	63.80	
02/16/16 Westlaw Online Research	0.00	0.00	248.53	
02/16/16 Westlaw Online Research	0.00	0.00	178.99	
03/16/16 Westlaw Online Research	0.00	0.00	139.03	
Total	0.00	0.00	1,591.60	
Online research				
01/25/16 Online research - Pacer	0.00	0.00	37.70	

## **Charges Exhibit**

Re: Marte Mr., Jon J. (224760-0) Invoice for charges rendered through 04/11/16

Date Charge Description				Amount	
01/25/16 Online research - Pacer		0.00	0.00	0.70	
	Total	0.00	0.00	38.40	
	Total			1,685.46	

Account: RICHARDSON PATRICK WESTBROOK ET AL, MOUNT PLE
Date Range: June 01, 2015 - June 30, 2015
Report Format: Summary-Account by Client by User by Day
Products: Westlaw, WestlawNext
Content Families: All Content Families

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INVOICE

Invoice Date: 01/07/2016

to: 12/31/2015 Usage From: 10/01/2015

Account Summary

18,530

Account #: Invoice #:

4734393

4734393-Q42015

\$0.10 Due Date: \$1,853.00

02/10/2016

**Amount Due:** 

\$1,853.00

Audio Files:

Rate: Subtotal:

Pages:

Subtotal:

Rate:

Current Billed Usage:

0 \$2.40

\$0.00

\$1,853.00

\$1,853.00

Previous Balance:

\$0.00

Current Balance:

810350 DN Oct-Dec/15

Total Amount Due:



\$1,853.00

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Amount Due

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#### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

JON J. MARTE and MELISSA R. WARD, individually and on behalf of others similarly situated,	) Civil Action No. 1:15cv1297-TSE-TCB
Plaintiffs,	)
v.	) )
GENERAL DYNAMICS INFORMATION TECHNOLOGY, INC.,	) ) )
Defendant.	) ) )

# DECLARATION OF JAMES L. WARD, JR. IN SUPPORT OF PLAINTIFFS' MOTION FOR AWARD OF ATTORNEYS' FEES AND COSTS

- I, James L. Ward, Jr., declare as follows:
- 1. I am a Partner of the law firm of Richardson, Patrick, Westbrook, and Brickman, LLC ("RPWB"). My firm has acted as counsel to Plaintiffs in this action.
- 2. I am submitting this Declaration in support of Plaintiffs' request for an award of attorneys' fees for services rendered in the above-captioned litigation and for reimbursement of costs and expenses incurred in connection with this litigation, as set forth in Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Memorandum in Support filed contemporaneously herewith.
- 3. RPWB's compensation for the services rendered on behalf of Plaintiffs is wholly contingent, and RPWB has been completely at risk that it would not receive any compensation for prosecuting Plaintiffs' claims against Defendant General Dynamics Information Technology, Inc. ("GDIT").

- 4. All attorneys at RPWB were instructed to keep contemporaneous time records reflecting the time spent on this case.
- 5. The detailed time records reflecting the total lodestar amount for RPWB's attorney time spent on this matter, based on reduced hourly rates for our firm, are attached to the Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs as **Exhibit A**. RPWB's fee and expense schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm. None of the time included in this fee application represents any work done in connection with preparing this Declaration or otherwise related to petitioning for an award of attorneys' fees or seeking reimbursement of costs.
- 6. The rates at which RPWB seeks compensation, as set forth in Plaintiffs' Motion and Memorandum in Support, are likely below the usual and customary requests for attorney services in similar Fair Labor Standards Act ("FLSA") cases. Plaintiffs' Counsel agreed to reduce their attorneys' fees in order to achieve the settlement of this case.
- 7. All of the services performed by RPWB in connection with this litigation were reasonably necessary in the prosecution and ultimate settlement of this case. There has been no unnecessary duplication of services for which the firm now seeks compensation.
- 8. The expenses incurred by RPWB are attached to the Memorandum in Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs as **Exhibit A**. These expenses were reasonably and necessarily incurred in connection with this litigation.
- 9. The expenses incurred are reflected on the books and records of RPWB. These books and records are prepared from checks, expense vouchers, and other source materials, which are regularly kept and maintained by the firm and accurately represent the expenses incurred.

10.	Plaintiffs' Co	ounsel limite	ed their costs to	o \$1,000 in order to achieve the settlement
of this case.				
I decla	are under pena	lty of perjur	y that the fore	going is true and correct.
Executed this	14th	day of	April	, 2016.
			James L.	Ward, Jr.